



State of Utah

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September 27, 2007

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Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: State of Utah's TRS Certification Application

The Utah Public Service Commission is pleased to submit the following renewal of application and the supporting documents for the time period of July 26, 2008 through July 26, 2013. This application is sent in response to the Federal Communications Commission (FCC) Public Notice of DA 07-2761, CG Docket Number 03-123 as released on June 22, 2007.

Should there be any questions regarding the FCC certification application documents, then please do not hesitate to contact me:

Sincerely,

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The State of Utah's FCC Certification Renewal and Supporting Documents

Introduction

The Utah Relay Service began in January 1988. It operated to serve the communication needs of people who are deaf, hard of hearing, and hearing in Utah and enabled access to communication for everyone. The Utah Association for the Deaf (UAD) provided the Telecommunications Relay Service (TRS) for many years. In the year 2000, the Utah Public Service Commission (PSC) awarded the contract to Sprint who now provides relay service through the name of Relay Utah. This service is a viable means of access to communication for everyone, and services will only improve and become more functionally equivalent.

The current contract between the Utah PSC and Sprint is effective until January 28, 2008, but the Commission reserves the right to renew the contract for a total of two additional one-year periods. This would allow the contract to potentially run through January 28, 2010

The State of Utah, with the assistance of Sprint Relay, has prepared this narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, particularly in response to the **FCC Public Notice DA 07-2761, CG Docket No. 03-123** released on June 22, 2007. Included in the Public Notice are the minimum mandatory FCC TRS requirements under 47 C.F.R. **§64.604 and §64.605**. A copy of this Public Notice and these mandatory requirements is attached as Appendix A.

The FCC has requested that each FCC TRS Certification Renewal application responds to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach materials, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

The Appendices included with this TRS Certification Renewal Application are as follows:

- A. Copy of the Public Notice DA 07-2761
- B. TRS, CapTel, STS, IP, VRS Training Outlines
- C. TRS, IP, VRS and CapTel Pledge of Confidentiality
- D. E911 Call Procedure
- E. Sprint Carrier of Choice Letter of Invitation
- F. Sprint Outage Prevention Program
- G. Sprint Disaster Recovery Plan
- H. Sprint TRS Standard Features Matrix
- I. Sprint Policy on 10 and 15 minute Rule
- J. FCC TRS Mandatory Minimum Standards & Compliance Matrix
- K. FCC CapTel Mandatory Minimum Standards & Compliance Matrix
- L. Sprint's Report to the FCC on VRS and IP Waivers
- M. Sprint Relay Fact Sheet
- N. Sprint's TSP Press Release
- O. Copy of Annual Report

- P. State Legislation and Public Service Commission Rules Establishing TRS Program in Utah
- Q. Copies of Complaint Logs from 2002-2007
- R. Copy of TRS RFP
- S. Copy of Substantive Change Letter
- T. Outreach Information - Presentations, Website, Storyboard, Advertisements, Flyers, Brochure
- U. Copy of TRS Information in Telephone Directories
- V. Copy of Telephone Bill with Surcharge Rate

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Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

Sprint IP (Internet Relay) CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced VCO service called Captioned Telephone (*CapTel*) Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job.

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Communication Assistants Training Program

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech (STS), CapTel and Video Relay Service (VRS) Training outlines in Appendix B.

A team of ASL-Fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminated from employment. See Appendix A

All *CapTel* CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call, therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

- 1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.
- 1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- 1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.
- 1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- 1.5 The CA shall pass along a *CapTel* caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.

- 1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel* and Video Relay Service (VRS) Training outlines in Appendix B for more information on CA training requirements.

CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint centers and or an independent third party quality testing firm has been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

Sprint Relay and the Relay Program Management team also perform test calls for *CapTel* CAs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure

that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call centers. This applies to Sprint IP and IP wireless relay CAs as well.

Sprint Relay utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

CapTel's voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all CapTel CAs.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Sprint Relay requires all CAs, including Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix B, Module 4I, and the Video Relay Service Training Outline and Qualifications. CapTel CAs also stay on all calls for a minimum of 10 minutes.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

When a Sprint relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request.

CapTel CAs are waived from this requirement. See Appendix K, FCC CapTel Mandatory Minimum Standards & Compliance Matrix.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Sprint CAs transmit and relay all conversations between the caller and the called parties in real time.

CapTel is a transparent service. CAs transmit audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and Video Interpreters (VIs) lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Sprint STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigation and screening.

- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Appendix C for the TRS Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.

CapTel Captioners must comply with the same rules that TRS follows regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *CapTel* Captioners. A copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found under Appendix C.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may have problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Sprint Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, Sprint Relay CAs will translate written ASL into conversational English. All Sprint Relay CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters, Sprint IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

Sprint Relay STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint Relay users have full control of all of their relay calls.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Sprint Relay Services

Sprint Relay provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Sprint Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Sprint Relay retain full control of the length and number of calls placed anytime through relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services.

CapTel CAs are currently waived for outbound calls because the *CapTel* CA is not involved in the call set up and cannot refuse the call *CapTel* users dial sequential calls directly therefore there it is not possible for a *CapTel* CA to refuse sequential calls or limit length of calls.

CapTel CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the *CapTel* CA cannot refuse to call. Please see Appendix K for more information on these waivers.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services shall be capable of handling pay-per-call calls.

Sprint Relay works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through Sprint Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls, and wrap up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and

available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Sprint Relay provides access to all available relay call types. A complete list of all call types proved by Sprint may be found in Appendix I Sprint Standard Features Matrix. Most call types are waived by the FCC for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

Except where waived by the FCC, *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to Sprint Relay CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the

connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

Sprint *CapTel* users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or “flash”) button on his or her CPE. Thus, Sprint *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel*. For Two-Line *CapTel*, either party can initiate a three- way call should the user purchased this as a LEC option. Sprint *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

When a Sprint Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, Sprint relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

CapTel users are able to hear and interact directly with the recorded message and makes the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service

provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

Utah's current 900 number is 1-900-230-2930.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Sprint Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix I, Standard Call Features Matrix.

Answering Machine

Sprint Relay CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

(UR MSG LEFT) CA XXXXM/F GA

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional outdials, the customer does not incur toll charges. Customers will only be charged for the first call. CapTel CAs are also equipped with the ability to retrieve messages stored on a local answering machine.

Voicemail Retrieval

Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. The CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a

recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

A.4 Handling of Emergency Calls

§64.604(a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Sprint meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Sprint Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the Sprint CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or
- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the Sprint CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If user tell operator to dial 911, operator will request supervisor assistance. User will need to provide the address and city where he/she is calling from. Supervisor will call Directory Assistance (on separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make outbound call to 911 dispatcher (PSAP). It can take few minutes or so to get the information. Users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing.

More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix D.

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's

participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, NJ)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay Utah users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix N for a copy of the general press release regarding the TSP program.

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Sprint's Relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, Video Relay and *CapTel* services.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Each Sprint CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix K.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Sprint Relay has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve Utah are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the Utah call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short- and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Sprint has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint currently samples every 15 minutes.

Sprint Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more the 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not be placed in a queue or on hold after reaching the Relay switch.

Sprint's Service Level calculation for TRS

Sprint's Service Level calculation for all TRS calls, excluding *CapTel*, is described below:

Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned),

(SVL = Number of calls handled in < 10 / Number of calls offered).

Sprint's Service Level Calculation for CapTel

For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

The number of calls that are answered by a CA is the number of Calls Answered.

The time for each call between the time the call arrives at the *CapTel* call center and the time answered by a CA until it is abandoned is the Speed of Answer.

Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the CapTel user they are calling. This time is subtracted out from the Speed of Answer time.

The total number of calls with the Speed of Answer as 10 seconds or less is the number of Qualifying Calls.

Qualifying Calls divided by Calls Offered = Service Level (x percent of calls answered within 10 seconds).

Sprint's Weighted Service Level for TRS

Sprint uses a 'weighting' process to combine the results of several Call Centers into a single result:

The 'weighted' service level (SVL) is a calculation that multiplies the number of 'State' calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the Sprint Relay Center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

Sprint's Weighted Service Level for CapTel

While *CapTel* operates two *CapTel* call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and is measured, unweighted, by this switch.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Sprint considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Please see (b)(2)(ii) above.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Please see (2) (b)(ii) above.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Sufficient transmission facilities have been provided to service all traffic levels, including busy hour peaks. Sprint utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers state Relay customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT) which are engineered at P.01 Grade of Service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These

measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Sprint Relay complies with this requirement. Please refer to Sprint Relay's report to the FCC under Appendix L.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Sprint provides Utah callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the Utah Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

- AT&T Communications
- Bell South Long Distance
- Bestline
- Birch Telecom
- Broadwing Communications
- Broadwing Telecommunications
- Cox Communications
- Excel Telecommunications, Inc.
- Global Crossings Telecommunications
- MCIWorldCom
- McLeod USA
- Qwest Communications
- SBC Communications Long Distance
- Souris River Telecommunications
- Sprint
- Telecomm*USA (MCIWorldCom)
- Touch America Services, Inc.
- U.S. Link

VarTec dba Clear Choice Communications
VarTec Telecom, Inc.
Verizon Long Distance
Winstar
Working Assets
WorldCom
WorldXChange

If a Utah caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix E for a sample of the Carrier of Choice letter sent to carriers when a customer has a preferred interexchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and CapTel Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Sprint Relay Network Support Plan

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control networks that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Utah, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for Relay Utah.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.
- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
 - Utilization of established plans to respond effectively to these outages.
 - The capability to rapidly deploy network transmission facilities when needed.
 - Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.
 - The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Sprint is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for Videophone users).

On 31 July 2006, Sprint launched **MySprintVRS number**. This **MySprintVRS Number** feature empowers Deaf and hard of hearing Video Relay Service (VRS) users with a simply means of receiving incoming calls. With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. ***Sprint VRS Mail for wireless devices*** is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM.

Sprint also provides *CapTel* services, which is recognized as an enhanced VCO service.

For more information on technology provided through Sprint Relay, please refer to Appendix M: Sprint Relay Fact Sheet.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Sprint Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to the Utah Public Service Commission. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Julie Orchard, Commission and Relay Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111
(801) 530-6716 (V/TTY)
(801) 530-6796 (Fax)
jorchard@utah.gov

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

TRS Outreach Program

The Utah Public Service Commission has been working with an advertising, marketing, and public relations firm, Penna Powers Brian & Haynes (PPBH) for approximately the last 4 ½ years. The working relationship has led to the development of the Helping Utah Connect campaign, and the success of this campaign is due, in part, to the relationships PPBH has built alongside the Commission with state agencies serving Utah's aging and hard of hearing populations as well as working within the deaf community. This has taken time to establish these mutually beneficial relationships.

The Commission and PPBH have been able to focus the message and material development to become streamlined and have developed a strong brand that has helped to overcome one of the biggest challenges that has faced the campaign, skepticism from the communities of deaf and hard of hearing people that Relay Utah is a public service program and not a for profit program. The brand has extended to the point that Relay Washington and Sorenson Communications have been seeking assistance from PPBH in order to reach the target populations.

Public relations efforts have resulted in solid relationships with directors and coordinators that manage programs, both public and private, for the aging and homebound in the State of Utah which has led to numerous speaking presentations statewide. This has led to overall awareness of Relay Utah and the equipment distribution program which are both administered through the Public Service Commission.

Over the last few years the Commission and PPBH have developed unique public service announcements regarding Relay Utah and the CapTel phone and service, flyers, brochures, and advertisements as well as assisted the Commission to host Relay Utah Open Houses in coordination with Sprint and Sorenson Communications.

Please refer to **Appendix T** for samples of flyers, brochures, public service announcements, and a list of outreach presentations.

TRS Information in Telephone Directories

Dex, Qwest's official directory, along with other local exchange carriers do provide information on TRS in the telephone directories.

Please refer to **Appendix U** to view the information in a Utah telephone directory.

Website

Anyone can access information regarding Relay Utah and all of the related services and equipment at www.relayutah.org or www.connectutah.com.

Please refer to **Appendix T** to view the home page of Relay Utah's website.

Outreach Programs

The Utah Public Service Commission has held several Open Houses and also has established a grassroots campaign for speaking engagements across the state regarding Relay Utah services and telecommunications equipment in order to raise awareness.

Please refer to **Appendix T** to view the list of presentations and open houses.

Outreach Materials

The Utah Commission has worked very hard in partnership with Penna Powers Brian & Haynes in order to develop advertisements, flyers, brochures, and unique and interesting public service announcements in order to increase awareness and knowledge regarding Relay Utah.

Please refer to **Appendix T** to see the included outreach collateral.

State TRS Advisory Board

Approximately 7 years ago, Sprint created the Relay Utah Consumer Council (RUCC) in order to provide constructive feedback about Relay Utah and TRS to the Utah Public Service Commission and to Sprint. Then about 5 years ago, the Utah PSC took the reins and has been running the RUCC ever since and has noticed great changes since that time. Each council member is responsible to attend quarterly meetings, review and recommend proposed enhancements, and share any and all results with the Commission and Sprint. Membership is available to individuals in Utah who use TRS and/or who are recommended by various organizations across the State. For those not residing in the Salt Lake City Metro area, they receive compensation in order to travel to the meetings.

Council members have a term of two (2) years and may come from, but not be limited to, the following organizations and consumer groups:

1. One member who is deaf, recommended by the Utah Association for the Deaf (UAD).
2. One member who is deaf recommended by the Robert G. Sanderson Center for the Deaf and Hard of Hearing (RGSCDHH).
3. One member who is hard of hearing recommended by the Self Help for Hard of Hearing (SHHH).
4. One member who is deaf as recommended by Deaf Seniors of Utah (DSU).
5. One member who has a speech disability who is recommended by the Utah Speech-Language and Hearing Association (USHA).

6. One member from the Association of Late Deafened Adults (ALDA).
7. One individual who is deaf or hard of hearing who owns a business.
8. One member from the Division of Vocational Rehabilitation.
9. One hearing parent of a high school student who is deaf.
10. One member representing people who are hearing.
11. One member-at-large.

C.4 Rates

§64.604 (4) Rates. *TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination*

Relay Utah users are charged no more for services than for those charges paid by standard “voice” telephone users. Relay Utah users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the State of Utah’s COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint’s Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	50%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	75%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. *Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery.* *Costs caused by interstate TRS shall be recovered from all subscribers for every interstate*

service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Utah relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

Please refer to **Appendix P** for the Public Telecommunications Law, Public Utilities Utah Code Title 54.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to the Utah Public Service Commission. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Relay Utah customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the Relay Utah Program Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to the Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline.

The Utah Public Service Commission has adopted the FCC's informal complaint procedure in addition to Sprint handling TRS complaints through the Customer Service Department.

Please refer to **Appendix Q** for the Complaint Logs for the years 2002-2007.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

The Sprint Customer Preference Database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint will transfer all Utah database

records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

- (a) (1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.***

Relay Utah does not provide Video Relay Services or Internet Relay Services for the State of Utah. Although there are references to Sprint Relay IP and Sprint Relay VRS services, the Utah Public Service Commission does not contract to provide these services, nor does the Utah Public Service Commission oversee these services for the State of Utah.

- (f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.***

The Utah Public Service Commission and Relay Utah does not conflict or circumvent the federal requirements for TRS.

Please refer to **Appendix R** for the most recent TRS Request for Proposal in 2004.

Please refer to **Appendix S** to view the Utah PSC's letter about adding the Captioned Telephone Service to Relay Utah regarding substantive change.

Please refer to **Appendix P** to see how TRS funding was originally communicated to the public.

Please refer to **Appendix U** to see a copy of a telephone bill to see the surcharge.

Refer to **Appendix P** to see the Legislative Mandate and the Utah PSC Rules.



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 07-2761
June 22, 2007

**CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS STATES THAT
CURRENT TELECOMMUNICATION RELAY SERVICE (TRS) CERTIFICATION
WILL EXPIRE ON JULY 26, 2008, AND PROVIDES A TIMELINE FOR SEEKING
RECERTIFICATION**

CG Docket No. 03-123

The current TRS certifications for all states and territories will expire on July 26, 2008. Under the TRS regulations, states can apply for “renewal” one year prior to expiration, *i.e.*, July 26, 2007. 47 C.F.R. § 64.605(c).

BACKGROUND

TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with voice telephone users. Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934. 47 U.S.C. § 225. Under the statute, TRS services are intended to be functionally equivalent to voice telephone service. The TRS regulations set forth mandatory minimum standards that TRS providers must follow in offering service, and are intended to ensure that TRS meets the functional equivalency mandate. *See* 47 C.F.R. §64.604 (set forth in the attached Appendix).

Because the states have primary responsibility for the oversight and compensation of intrastate TRS, the regulations also set forth the process by which state TRS programs may be certified. 47 C.F.R. § 64.605; *see also* 47 U.S.C. §§ 225(c) & (d)(3)(B). The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The relevant sections of § 64.605 are set forth in the Appendix.

APPLICATIONS FOR CERTIFICATION:

Applications for certification (or renewal of certification) may be filed with the Commission beginning July 26, 2007. All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech (STS) service. If a state program also offers Internet Protocol (IP) Relay, Video Relay Service (VRS), Captioned Telephone Service, or IP Captioned Telephone Service, the state must also demonstrate that it provides these services consistent with the rules.

Although there is no deadline for filing, renewal applications should be filed by October 1, 2007, to give the Commission time to review and rule on the applications prior to the expiration of the prior certification.

Applications for certification are reviewed to determine whether the state TRS program has sufficiently documented that it meets all of the applicable mandatory minimum standards set forth in Section 64.604. If the program exceeds the mandatory minimum standards, the state must certify that the program does not conflict with federal law.

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123.

Electronic Filers: Filings may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Follow the instructions provided on the website for submitting electronic filings.

- For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the filing for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic filing by Internet email. To get filing instructions, filers should send an email to ecfs@fcc.gov, and include the following words in the subject line or body of the message: get form <your email address>. A sample form and directions will be sent in response.

Paper Filers: Parties who choose to submit by paper must submit an original and four copies of each filing on or before October 1, 2007. To expedite the processing of complaint log summaries, states and interstate TRS providers are encouraged to submit an additional copy to Attn: Diane Mason, Federal Communications Commission, Consumer & Governmental Affairs Bureau, 445 12th Street, SW, Room 3-A503, Washington, D.C. 20554 or by email at Diane.Mason@fcc.gov. Parties should also submit electronic disk copies of their certification filing on a standard 3.5 inch diskette or CD-Rom formatted in an IBM compatible format using Word 2003 or compatible software. The electronic media should be submitted in “read-only” mode and must be clearly labeled with the state’s name, the filing date and captioned “TRS Certification Application.”

Filings can be sent by hand or messenger delivery, by electronic media, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). The Commission's contractor will receive hand-delivered or messenger-delivered paper filings or electronic media for the Commission's Secretary at 236 Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building. Commercial and electronic media sent by overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, SW, Washington, D.C. 20554. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-B204, Washington, D.C. 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE:

DATE	ITEM	FCC ACTION
October, 2007	Public Notices are issued indicating that applications have been received by the Commission and seeking comment	Public Notices are released seeking comment on the filing. Comments due within 30 days and then an additional 15 days for reply comments.
September 2007 – May 2008	Applications for TRS recertification are reviewed for compliance with 47 C.F.R. §§ 64.604 & 64.605.	Deficiency letters are sent to request additional information that demonstrates compliance with the mandatory minimum requirements.
May - July, 2008	Public Notices informing states that their applications for recertification have been reviewed and certification has been renewed.	Public Notice

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, D.C. 20554. Customers may contact BCPI at their web site: www.bcpweb.com or by calling 1-800-378-3160. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at <http://www.fcc.gov/cgb/ecfs> (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: <http://www.fcc.gov/cgb/dro>.

For further information regarding this *Public Notice*, please contact Diane Mason, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail at Diane.Mason@fcc.gov.

APPENDIX

RELEVANT RULES:

§64.604 MANDATORY MINIMUM STANDARDS¹

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

- (a) *Operational standards*—(1) *Communications assistant (CA)*. (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.
- (ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.
- (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.
- (iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
- (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.
- (vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.
- (vii) TRS shall transmit conversations between TTY and voice callers in real time.
- (2) *Confidentiality and conversation content*. (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.
- (ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.
- (3) *Types of calls*. (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

¹ Note that some of these requirements have been waived for certain forms of TRS.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

(iv) Relay services shall be capable of handling pay-per-call calls.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

(4) *Handling of emergency calls.* Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(5) *STS called numbers.* Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

(b) *Technical standards*—(1) *ASCII and Baudot.* TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

(2) *Speed of answer.* (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

(3) *Equal access to interexchange carriers.* TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

(4) *TRS facilities.* (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

(5) *Technology.* No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 *et seq.*

(6) *Caller ID.* When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

(c) *Functional standards—(1) Consumer complaint logs.* (i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

(2) *Contact persons.* Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

(3) *Public access to information.* Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should

extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

(4) *Rates.* TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

(5) *Jurisdictional separation of costs*—(i) *General.* Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

(ii) *Cost recovery.* Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) *Telecommunications Relay Services Fund.* Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) *Contributions.* Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) *Contribution computations.* Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) *Data collection from TRS Providers.* TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) *Payments to TRS providers.* TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or

(2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or

(3) Interstate common carriers offering TRS pursuant to §64.604; or

(4) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with

the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) *Information filed with the administrator.* The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (*See* 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (*See* 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (*See* 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) *Complaints*—(i) *Referral of complaint.* If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

(iii) *Jurisdiction of Commission.* After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) *Complaint procedures.* Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) *Informal complaints—(1) Form.* An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) *Content.* An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) *Service; designation of agents.* The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) *Review and disposition of informal complaints.* (1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail).

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) *Formal complaints.* A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) *Amended complaints.* An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) *Number of copies.* An original and two copies of all pleadings shall be filed.

(F) *Service.* (1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) *Answers to complaints and amended complaints.* Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) *Replies to answers or amended answers.* Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) *Defective pleadings.* Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

(7) *Treatment of TRS customer information.* Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

[65 FR 38436, June 21, 2000, as amended at 65 FR 54804, Sept. 11, 2000; 67 FR 13229, Mar. 21, 2002; 68 FR 50977, Aug. 25, 2003; 69 FR 5719, Feb. 6, 2004; 69 FR 53351, Sept. 1, 2004; 69 FR 55985, Sept. 17, 2004; 69 FR 57231, Sept. 24, 2004; 70 FR 51658, Aug. 31, 2005; 70 FR 76215, Dec. 23, 2005]

§64.605 STATE CERTIFICATION.

(a) *State documentation—(1) Certified state program.* Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by

the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

(2) *VRS and IP Relay provider.* Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “VRS and IP Relay Certification Application.” The documentation shall include, in narrative form:

- (i) A description of the forms of TRS to be provided (*i.e.*, VRS and/or IP Relay);
- (ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;
- (iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;
- (iv) A description of the provider's complaint procedures;
- (v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;
- (vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;
- (vii) Demonstration of status as a common carrier; and
- (viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) *Requirements for state certification.* After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

- (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;
- (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and
- (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) *Requirements for VRS and IP Relay Provider FCC Certification.* After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

- (i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;
- (ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(c)(1) *State certification period.* State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(2) *VRS and IP Relay Provider FCC certification period.* Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(d) *Method of funding.* Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) *Suspension or revocation of state certification.* The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

(2) *Suspension or revocation of VRS and IP Relay Provider FCC certification.* The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(f) *Notification of substantive change.* (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

[70 FR 76215, Dec. 23, 2005]

Appendix B: Sprint TRS, STS, CapTel, and VRS Training Outlines

Sprint TRS Training Outline

Module	Module Description
Module 1	Orientation <ul style="list-style-type: none"> ▪ Objectives ▪ Welcome & History ▪ Future of Sprint ▪ What is Relay? ▪ CA Training ▪ Call Flow Chart
Module 2	Phone Image <ul style="list-style-type: none"> ▪ Objectives ▪ Introduction ▪ Communicating Information ▪ Using Conversational Tone ▪ Managing Dissatisfied Customers
Module 3A	Overview of System and Equipment <ul style="list-style-type: none"> ▪ Objectives ▪ Logging In ▪ Logging Out ▪ Screen Display ▪ Checking for Understanding ▪ Headsets ▪ Modem ▪ Error Correction ▪ Keyboard ▪ Last Typed Macro Feature ▪ English Macros ▪ Spanish Macros ▪ Telephony Terms
Module 3B	Interactive Terminals <ul style="list-style-type: none"> ▪ Knowing Your TTY ▪ Closing a Conversation ▪ Typing Background Noises
Module 3C	Overview of System and Equipment (FRS Only) <ul style="list-style-type: none"> ▪ Malfunctions ▪ Relay Procedures ▪ Confidentiality ▪ Statistics ▪ Handling Obscene Calls ▪ Requesting a Supervisor ▪ Reporting ▪ Macros
Module 4A	Call Processing Procedures <ul style="list-style-type: none"> ▪ Objectives ▪ Your Role as CA ▪ Call Processing for All States

Module	Module Description
Module 4B	Destinations of Traffic <ul style="list-style-type: none"> ▪ Destinations not Allowed ▪ IntraLata Competition ▪ State Differences
Module 4C	Answering Machines and Audiotext <ul style="list-style-type: none"> ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	Voice Originated Calls <ul style="list-style-type: none"> ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	Long Distance Calling <ul style="list-style-type: none"> ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	VCO and HCO <ul style="list-style-type: none"> ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	Alternate Call Types <ul style="list-style-type: none"> ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLata COC ▪ IntraLata COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	Customer Database <ul style="list-style-type: none"> ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Outdial Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	Variations <ul style="list-style-type: none"> ▪ Busy Signals ▪ Poor Connection ▪ No Answer ▪ Request for Information ▪ Speech Impaired ▪ Pacing Voice Customer ▪ Profanity towards CA ▪ Request for M or F CA ▪ CA Knows Customer ▪ Suicide ▪ Abuse ▪ Illegal Calls ▪ Sensitive Topics ▪ Redialing ▪ Switchboards ▪ Young Children ▪ Inbound ASCII ▪ Repeating Information ▪ Request for Relay Number ▪ Restricted Calls ▪ ASCII on Outbound Line ▪ Regional 800 ▪ Two Calling From Numbers ▪ LEC Service Office ▪ Double Letters ▪ Call Waiting ▪ Conference Calls ▪ Three-Way Calling ▪ Changing CAs ▪ 800 Number Referral ▪ Hard-of-Hearing Customer ▪ Call Backs for TTYs ▪ Multiple Calls
Module 4I	Variations <ul style="list-style-type: none"> ▪ Call Modification ▪ Holding ▪ Alternate Language ▪ Typing in Parenthesis ▪ Product Information ▪ Spanish Calls ▪ Voice Customer Hangs Up ▪ Variable Time Stamp ▪ TTY Customer Hangs Up ▪ Conversation being Recorded ▪ Prompting Voice for "GA" ▪ Non-Standard TTY Capability ▪ Internet Characters ▪ TTY does not type "GA" ▪ Cellular Long Distance Calls ▪ Party Line Calls

Module	Module Description
Module 5	Emergency Call Processing <ul style="list-style-type: none"> Emergency Calls Non-Emergency Calls Emergency Incident Form
Module 6A	Performance and Procedures <ul style="list-style-type: none"> Performance Measurement Plan Quality Customer Service Commitment Personal Effectiveness Assessment Survey and Replay Emergency Procedures Emergency Assistance Form Checking for Understanding
Module 6B	Healthy Relay <ul style="list-style-type: none"> Introduction Analogy Stretching Exercises CA Reinforcement Ergonomic Review Setting up Workstation GUAM - Get up and move
Module 6B	Healthy Relay <ul style="list-style-type: none"> Ergonomic Relief Slowing the Customer Overtime Relaxation
Module 7A	Responding Positively <ul style="list-style-type: none"> Stress Management Thoughts and Feelings Relaxing Emotionally Thinking Powerfully Exercise Nutrition Relaxation/Meditation Energy Resource Assessment Suggested Reading Leader's Notes
Module 7B	Healthy Detachment <ul style="list-style-type: none"> Interactive Communication TDD Communication Potential Stressors Detaching
Module 8	Assessing Performance <ul style="list-style-type: none"> Assessment Process Coaching Feedback Pass/Fail Guidelines Role Plays

Module	Module Description
Module 9	Supervisor as Trainer and Coach <ul style="list-style-type: none"> ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	A Healthy Approach to Relay <ul style="list-style-type: none"> ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	Orientation	
	<ul style="list-style-type: none"> ▪ Objectives ▪ Welcome & Introductions ▪ Description ▪ History 	What is Speech to Speech Differences from Relay Agent Training
Module 2	Speech to Speech Customers	
	<ul style="list-style-type: none"> ▪ Objectives ▪ Introduction ▪ Phone Image ▪ Characteristics of Speech to Speech Customers ▪ Breaking the Stereotypes 	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
Module 3	Attributes of STS CAs	
	<ul style="list-style-type: none"> ▪ Objectives ▪ Patience ▪ Concentration ▪ Listening Skills 	Caller Control Sensitivity and Understanding
Module 4A	Call Processing Procedures	
	<ul style="list-style-type: none"> ▪ Objectives ▪ Your Role as CA ▪ Billing ▪ Directory Assistance ▪ Changing CAs 	
Module 4B	Answering Machines and Audiotext	
	<ul style="list-style-type: none"> ▪ Answering Machines ▪ SA to SD Answering Machine ▪ Busy/Disconnects ▪ Audiotext Message ▪ Pagers/Beepers 	
Module 4C	Emergency Call Processing	
	<ul style="list-style-type: none"> ▪ Emergency Services ▪ EM Numbers ▪ Emergency Incident Form 	
Module 4D	Variations	
	<ul style="list-style-type: none"> ▪ Outbound to Relay ▪ Personal Conversations ▪ Operator Calls ▪ Talking on Hold ▪ Keeping the Customer Informed ▪ Differentiating STS and Relay ▪ Outdialing to STS 	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

Sprint CapTel Training Outline

1.0 Training Summary Outline

1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs are given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

1.3 Videos

Several videos are shown to better demonstrate the job of a CA and how the technology works and how it provides improved communication for our clients. After each video, questions are answered or clarified as needed.

1.4 Mini Demonstration *CapTel* Phone

A brief explanation of the *CapTel* phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel* phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

1.5 Introduction - Developing a Personal Voice Profile

Developing a personal voice profile is the most important step to successfully process *CapTel* calls. CAs are given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and “re-voice” what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

1.7 Introduction - Call Handling Tools

Macros are utilized to aid in the speed and accuracy of calls. CAs listen to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

1.8 Introduction - Call Handling Skills –Pacing a Conversation

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

1.9 Introduction - Call Handling Skills – Inserting Words

CapTel trains its CAs to insert particular words that the Voice Recognition is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

1.10 Introduction – How to Handle Various Recordings

CAs are introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs view a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

1.11 Introduction & Demo of *CapTel* Conversation

Each trainee observes each end of the "telephone call", (CA, *CapTel* user, hearing person). Each CA assists in making "live" calls to other trainees. This encourages each CA to observe and experience what our clients experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

2.0 Introduction to Call Simulation

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor, however they do not interfere with the quality of captions going to the *CapTel* user. New CAs are paired with experienced CAs on the production floor to observe and listen to live calls.

2.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings provide a progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

2.2 Review of Baseline Timings

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

2.3 Introduction to Correction Tool

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

2.4 Review Training Elements

CAs meet as a group with the trainer to review the various elements that enable them to provide the quality of captions we expect from each CA.

3.0 Monthly Timing Policy

CTI's monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

3.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive an official timing. This second timing is a base-line timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

4.0 Production Floor Orientation

Current supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Possess the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix C: TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CapTel CA Pledge of Confidentiality

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.
- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at *CapTel* Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name

Date

Appendix D: E 911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a “hot key”.
- The CA’s terminal sends a query to the E911 database containing the caller’s geographic area ANI.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

When a CapTel user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller’s Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

If a CapTel user had only one line connected to their CapTel phone, captions will not be engaged on the call. A prompt on the phone will instruct the CapTel user how to communicate with the 9-1-1 center to request Voice-Carry-Over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the 911 dispatcher.

Appendix E Sprint Carrier of Choice Letter of Invitation



(date)

(name)

(Company name)

(address)

(telephone)

(fax)

(e-mail address)

Re: (Customer's name and phone number – requested LEC for
COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use (Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS. The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you are a participating member at Sprint Carrier of Choice program, please disregard.

2. If you are not a participating member at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Non-facility based provider

1. If your underlying toll carrier is a participating member at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier is not a participating member at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
4. You or your underlying toll carrier will need to support SS7 tandem interconnection.
5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair **60, 66, and 67**.
6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

***Note:** For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem. *Attachment C* is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days). **Information obtained from the carriers will be used solely for the purpose of providing equal access for (Company Name) LD customers and shall be held proprietary.**

Sprint welcomes your company's participation in our TRS Carrier of Choice program at **no cost** to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-

win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue. Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

<u>Entity</u>	<u>CIC Code</u>
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bel
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bel
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager
 <Street1> <Street2>
 <City>, <State> <Zip Code>
 FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. Regional COC Tandems

You will need to provide Sprint with the following:

Toll Carrier: < insert name>

CIC Code: <insert CIC>

Underlying Toll Carrier: <insert name>

Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bel
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bel
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. Call Type Restrictions

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix F: Sprint Route Outage Prevention Programs

Call Before You Dig Program

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operations department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOC in cases where a network problem may affect Relay Utah's operations. In cases such as these, the NOCC or RCC immediately alerts the ESOC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOC when a problem is detected in the TRS center that is not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the state of Utah's call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

CAPTEL OUTAGE PREVENTION

Sprint will provide FCC compliant *CapTel* service from the two *CapTel* Service Centers in Madison and Milwaukee, WI. Sprint's *CapTel* vendor *CapTel Inc.* (CTI) operates the two current *CapTel* Service Centers in the nation. These unique Centers operate with enough terminals for 200 agents each, along with support personnel, Technicians, and Supervisors.

Both *CapTel* Service Centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two *CapTel* Service Centers ensures minimum interruptions in service if something unexpectedly halts operations in one Center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

Appendix G: Disaster Recovery Plan

Sprint's comprehensive Disaster Recovery Plan developed for Utah details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the State of Utah's Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation for the State of Utah is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore Relay Utah to its full operating level in the shortest possible time.

Relay Utah Notification Procedure

To provide the State of Utah with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for Utah includes three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the Public Service Commission Administrator within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to the State of Utah has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Public Service Commission Administrator within five business days of return to normal operation. Examples of service disruption to Utah include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to Relay Utah CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

Disaster Recovery Procedures

If the problem is within the relay center serving Utah, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOC. If the problem occurs during non-business hours and requires on-site assistance, the ESOC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

Time Frames for Service Restoration

Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- **Sprint Call Center Equipment** - A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities** - For an outage of facilities directly serving Utah's incoming TRS calls will immediately be routed to one of ten other centers throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center** - Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.
- **Due to Telco Facilities Equipment** - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a telco central office - In Fairview, Utah, for example, only local Fairview residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

The following information is required when a Relay Utah user is reporting trouble:

- Service Description "Relay Utah"
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by Relay Utah users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOC will handle calls from the Customer Service agents 24 hours a day, 7 days a week.

The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's 11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2 Current MTTR Objectives

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

Escalation Procedures

If adequate results have not been achieved within two hours, a Relay Utah user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

Escalation Level	Contact	Phone
2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control networks support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network, with significant fiber miles in Utah, provides critical advantages over the other carriers. These advantages include:

- **Quality**

Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- **Economy**

The overall quality, architecture, and advanced technology of digital fiber optics makes transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- **Expandability**

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- **Survivability**

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to the State of Utah, and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The 1 LATA in Utah is served by 10 (ten) Sprint POP. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With one POP in the state, the area is adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. The State of Utah would primarily be served by the DMS switches in Salt Lake City, Utah.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control centers. These factors combine to assure outstanding network performance and reliability for Utah.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Sprint Outage Notification from *CapTel* Service Center

Performance at the *CapTel* Service Center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the *CapTel* Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the *CapTel* Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
 - An accidental switch rebooting
 - Loss of transmission facilities through the telephone network
 - Terrorist attack
 - Bomb threat or other work stoppage
 - Sudden loss of agent position capabilities.
 - Impact to minimum ASA / Speed of Answer times
 - Acts of God

Contact from the *CapTel* Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are (or were) impacted?
- 4) What is (was) the solution to restore service?
- 5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: John.E.Moore@sprint.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

If the problem is within the *CapTel* Center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the *CapTel* Service center to allow for the most common type of repair required without the ordering of additional equipment.

Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours

Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

Disaster Recovery Follow-Up

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with CapTel Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

Disaster Recovery Post-mortem documentation

72 hours (3 days) after the outage is resolved, CTI will need to provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point of contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

- 1) What time did the outage happen in CENTRAL TIME?
- 2) What caused it?
- 3) Which customers are or were impacted?
- 4) What is the solution to restore service?
- 5) What is the time that service will be or was restored IN CENTRAL TIME?
- 6) What will *CapTel*, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

Time Frames for Service Restoration

Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.
- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level
- Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

Trouble Reporting Procedures (for Individual Customers to Customer Service)

All calls concerning customer service issues should be placed by dialing the *CapTel* Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English only. A Customer Service agent will take information concerning:

- Caller's Name
- Contact Number
- Calling to / Calling from (if applicable)
- Description of the trouble

Report service affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 Pam.Frazier@captelmail.com

Table 4 – CapTel Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

The recording played to customers outside of CapTel customer service business hours:

Thank you for calling CapTel customer service. Our hours are Monday through Friday from 8AM to 5PM central time. You may try again during business hours or leave a voice mail message by pressing 3 now.

If the “3” button is pressed, then the customer will hear the following message:

Thank you for calling CapTel customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area

code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

Alternative usage for CapTel phone during outage for VCO users.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.

Appendix H: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialled and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix I: Policy on 10- and 15-Minute Rule

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the “spirit” of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

“THIS IS CA # CONTINUING YOUR CALL.”

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix J: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Provision of Services		
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.</p> <p>Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).</p> <p>Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.</p> <p>Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.</p>
Operational Standards		
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.</p> <p>Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).</p> <p>Sprint administers Oral-to-type tests.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere to RID Code of Ethics.
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p> <p>Certain exceptions are provided for Speech-to-Speech calls.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p>CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>Sprint CAs are prohibited from disclosing any call content.</p> <p>STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</p> <p>CAs relay calls verbatim and do not alter relayed conversation.</p> <p>During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.</p>
§ 64.604 A.3	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers.</p>	<p>CAs process all calls and never prohibit sequential calls or limit length of calls.</p> <p>Sprint TRS is capable of handling all call types normally provided by common carriers</p>
§ 64.604 A.4	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP.</p> <p>CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.</p>
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10</p>	<p>TRS and VRS CAs stay on the call for a minimum of 10 minutes.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	minutes. STS CAs - 15 minutes.	STS CAs stay on the call for a minimum of 15 minutes.
§ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
§ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user. Sprint will provide the STS user information to any new provider.
Technical Standards		
§ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
§ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. Abandoned calls shall be included in the speed-of-answer calculation. Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. Speed of Answer is measured on a daily basis. Sprint's system is designed to the P.01 standards.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 B.3	Equal Access to IXCs TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.
§ 64.604 B.4	TRS Facilities TRS shall operate everyday, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.	Sprint TRS is available 24 hours a day, everyday. Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use. Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.
§ 64.604 B.5	Technology No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities. VCO & HCO technology are required to be standard features of TRS.	Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression. Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.
§ 64.604 B.6	Voicemail & Interactive Menus CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal. TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete	CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call. Sprint does not charge for any additional calls necessary to complete call involving recorded or interactive menus.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	calls involving recorded or interactive messages. TRS will handle pay-per-calls.	Sprint was the first provider to process pay-per-calls (Texas, 1996).
Functional Standards		
§ 64.604 C.1	Consumer Complaint Logs States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution. States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution. Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31 st . Sprint has submitted annual summary of Consumer Complaints log report: June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004-May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007
§ 64.604 C.2	Contact Persons States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
§ 64.604 C.3	Public Access to Info Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	Conduct ongoing education and outreach programs to publicize availability of 711 access.	TRS. Sprint regularly provides 711 dialing information in its education and outreach programs.
§ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	 Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.
§ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)	 (i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism. (iii) Sprint works with NECA for reimbursement of interstate minutes.
§ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	 The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.
§ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities Transmittal of Calling Party Information	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (§16) Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (§22) Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (§25)	Sprint's SS7 platform supports Caller ID services. Sprint complies with all FCC rules pertaining Caller ID and call blocking services. Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>VCO-to-VCO</p> <p>This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)</p>	
Handling of Emergency Calls	<p>Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (§42)</p> <p>This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)</p>	<p>Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.</p>
Answering Machine Message Retrieval	<p>This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.</p> <p>Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (§62)</p>	<p>Sprint has provided the Answering Machine Retrieval since 1996.</p>
Call Release	<p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation.</p> <p>Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (§68)</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has provided the Call Release feature since 2003.</p> <p>Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.</p>
Speed Dialing	<p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
Three-way Calling	<p>Three-way calling feature is generally arranged in one of two ways. (§73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties</p> <p>or;</p> <p>2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.</p>

Appendix K: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶7)</p>	<p>Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first -ever in the TRS Industry.</p> <p>Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to CapTel services.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p> <p>Typing Speed - 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>Requirement applies.</p> <p>Use of CapTel's voice recognition software "is a permissible means ...for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§139).</p> <p>Waived. Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for ... enhancing transmission speed..." (§139)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p>	<p>Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.</p> <p>A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL</p> <p>CapTel's voice recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all CapTel CAs</p>
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 A.3</p>	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p> <p>TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.</p>	<p>Waived for outbound calls (§ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (§46)</p> <p>Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	<p>CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.</p> <p>CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p>CapTel is capable of handling all call types normally provided by common carriers.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.5	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.
§ 64.604 A.6	<p>CA Gender Preferences</p> <p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	Waived. (§ 36, 47-48).	
§ 64.604 A.7	<p>STS Called Numbers</p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	Waived. (§29)	
Technical Standards			
§ 64.604 B.1	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	Waived. (§53-54)	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.2</p>	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Requirement applies</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.</p>
<p>§ 64.604 B.3</p>	<p>Equal Access to IXC's</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Requirement applies.</p>	<p>CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.4</p>	<p>TRS Facilities</p> <p>TRS shall operate everyday, 24 hours a day.</p> <p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p>	<p>FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p>	<p>Sprint CapTel is available 24 hours a day, everyday.</p> <p>Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p>
<p>§ 64.604 B.5</p>	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 B.6</p>	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.</p> <p>CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.</p> <p>Sprint CapTel supports pay-per-call call types.</p>
Functional Standards			

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.1	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	Requirement applies.	<p>Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p>
§ 64.604 C.2	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	Requirement applies.	Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
§ 64.604 C.3	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
<p>§ 64.604 C.4</p>	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	<p>Requirement applies.</p>	<p>CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>Requirement applies.</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.6	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
§ 64.604 C.7	<p>Treatment of TRS Customer Info</p> <p>Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	Requirement applies.	Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.
§ 64.605	<p>State Certification</p> <p>Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.</p>	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.

FCC 03-112 Appendix D Final Rules		FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint CapTel will deliver the SS7 technology on February 1, 2004.
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint CapTel supports the VCO calling combinations.
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users. Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by CapTel. Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.</p>	Waived. (§ 52)	
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have the Speed Dial feature.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.</p> <p>The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways " One way is for the TRS consumer to request that the CA set up the call with two other parties.</p> <p>The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling. (For One-Line CapTel.) For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.</p>

Appendix L: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated	We are currently providing two-line VCO and HCO controlled at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					<p>data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p>	<p>the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.</p>
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated	Sprint implemented a "manual" (directory assistance	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated	No additional information to submit beyond our recent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					interexchange carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						connection at end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO – to – TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix M: Sprint Relay Fact Sheet

Sprint Relay

www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:

Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free

service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experienced Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

- 1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.
- 2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

CapTelSM (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen so the user can read the words while listening to the voice of the other party. For more information on CapTel, visit www.captionedtelephone.com.

Relay Conference CaptioningSM, developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

Appendix N: Copy of TSP Press Release

Media Contact:

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General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for

Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.

Appendix O: Copy of Annual Report

The following is an Annual Report of the overall programs funded by the surcharge for the Utah Public Service Commission for Fiscal Year 2007.

Telecommunications Relay Service & Equipment Distribution Program

Fiscal Year 2007 has been another year of great change and advances in telecommunications services and equipment for people with hearing loss or speech disabilities. Choices continue to expand for people unable to use a standard telephone now that there are Video Relay Services, Internet Protocol Relay, captioned telephones in addition to the improvements to equipment such as amplified telephones and text telephones. Traditional Telecommunications Relay Service (TRS) has been available for more than 17 years now, and other more non-traditional uses of TRS are accessible with services in Spanish, Speech-to-Speech, Voice Carry Over/CapTel, and Hearing Carry Over. Equipment distribution has seen enormous growth over the last few years as the Commission continues with advertising and public relations targeted to those people who are hard of hearing, a population whose number is predicted to grow as baby boomers age and health services improve resulting in increased longevity of life.

Outreach Efforts

The Relay Utah service was initiated in 1988 as one of the first Relay services established in the United States. Housed under the umbrella of the Public Service Commission, Relay Utah provides access to hearing assistive equipment and telephone relay services, through Sprint, to allow Utah citizens who are deaf, hard of hearing or speech disabled more efficient communication. The Public Service Commission has been using the services of an advertising agency, Penna Powers Brian Haynes (PPBH), to help with outreach, marketing, and public relations for Relay Utah and the equipment distribution program. PPBH created a new television spot entitled “Family Portrait” that aired along with three other Relay Utah related commercials that appearing on CBS – Channel 2, ABC – Channel 4, and KJZZ – Channel 14. The television spot emphasizes how the telephone equipment distribution program and specifically the CapTel phone has enhanced a grandmother’s life and the lives of her family because of their ability to communicate easily. “Senior Minute,” a television program for seniors has run a few different interviews regarding information about Relay Utah and the CapTel phone. This three-minute program aired on KJZZ has been an excellent means of getting out information about Relay Utah and the equipment distribution to the public. Print ads appeared in publications such as Utah Spirit, Prime Times, Shakespearean Festival Play Bills for summer and fall, Best Years magazine, and Salt Lake City Senior Directory. Media placements appeared in the Deseret Morning News and The Enterprise. Other accomplishments include the creation of a new Relay Utah/Sprint brochure that provides details of the services and equipment options available for the deaf, hard of hearing and speech disabled. The Relay Utah display was also updated showing the new equipment that is available. To round out methods of outreach, a more grassroots means of informing the public has been through speaker’s bureau presentations made by the Public Service Commission at senior centers throughout the state. These presentations have led to increases in

applications for, and distribution of, specialized telecommunications equipment.

Relay Utah Presentations

7/5/05	Crossroads Senior and Community Center, Roosevelt – 70 attendees
9/16/05	Murray Heritage Center – 20 seniors
11/2/05	Smithfield City Senior Citizens Center – 80 seniors
11/10/05	South Sevier Senior Center, Monroe - 30 seniors
12/5/05	Park City Senior Citizens Center – 30 seniors
12/16/05	Coalville Senior Center – 25 seniors
1/9/06	Columbus Senior Center, SLC – 75 attendees
1/11/06	Tooele County Senior Citizens Center – 65 attendees
2/2/06	Richfield Senior Citizen Center – 39 attendees
2/16/06	South Summit Senior Center – 45 attendees
3/22/06	Provo Eldred Center – 80 attendees
3/29/06	Golden Hours – 40 attendees
4/13/06	Harmon Home Senior Center, West Valley City – 7 attendees
4/27/06	Orem Senior Friendship Center – 100 attendees
5/3/06	Harmon Home Senior Center, West Valley City – 40 attendees

Equipment Distribution

With the number of presentations made across the state in addition to the advertising efforts, requests for applications for specialized telecommunication equipment continue to increase as seen in the following chart. Only one Commission staff member has been handling the equipment distribution and training, but the Public Service Commission is in the process of hiring additional help to meet the growing demands.

Fiscal Year	Pieces of Equipment Distributed
2000	53
2001	41
2002	105
2003	127
2004	188
2005	338
2006	574
2007	671
Total	2097

House Bill 145

With new technological developments and changes in the telecommunication industry, designed to meet the needs of the deaf and hard of hearing, there has been a decline in use of the traditional text telephone (“TTY”) and an increase in other services such as video relay service and Internet protocol relay. As these options for communication have expanded, there has developed an

extreme shortage of American Sign Language interpreters available to meet these growing needs. Besides the need in the video relay service area, the demand for interpreters in the community and in the educational field has also increased. As a result, during the 2005 legislative session, Senator Brent Goodfellow sponsored House Bill 145, "Amendments to Hearing and Speech Impaired Telecommunications Program," which passed unanimously in the Senate. This bill allowed for the PSC to solicit bids through the state procurement process with the goal of increasing the number of Novice, Intermediate, and Advanced American Sign Language interpreters in Utah. Following the process, the PSC was able to award contracts to three separate sign language interpreter training programs: Utah Valley State College (UVSC), the Utah Interpreter Program, and Salt Lake Community. It is a time of great opportunity to be studying sign language interpreting because there are three different training programs available to meet a variety of needs in Orem or the Salt Lake area. These new programs have allowed for the creation of new, paid positions as well as the use of mentors who are deaf to improve the skills and abilities of interpreters in training. Scholarships or grants are often available to those in training.

Utah Valley State College has 11 students enrolled at this time. UVSC is also trying to expand a Novice Level Program by offering a bachelors degree in American Sign Language and Interpreting. Two levels of approval remain in that process. Eight new courses specifically for interpreting students will be offered which will expand the Novice Level Program.

The Utah Interpreting Program established its Interpreter Certification Advancement Network and has 15 interpreters focusing on both American Sign Language development and interpreting skills with the assistance of seven mentors who are deaf. Only being at the midpoint of the first year, this individualized mentoring approach seems to be highly effective and should see results of all enrolled to become certified.

As a result of PSC funding, a Fast Track program was implemented at Salt Lake Community College, which supplements the regular interpreter-training program already in progress. Nine students are enrolled in the Fast Track, while 55 first year students and 16-second year students round out the more traditional interpreting training program

Relay Utah

Captioned Telephone (CapTel)

CapTel is a newer technology designed for people who are hard of hearing but are able to speak for themselves over the telephone line by using voice recognition technology. Ultratec designed the captioned telephone and ran several trials before distribution became public. The State of Utah was able to participate in one of those trials in the fall of 2003 and has been distributing the equipment ever since. The CapTel allows people who are hard of hearing to not only hear, but it also has captioning on a screen that allows users to read the conversation of the other person speaking on the telephone. This technology makes a conversation more natural and enjoyable for everyone involved, and the CapTel is considered to be one of the most functionally equivalent forms of communication to be introduced for deaf and hard of hearing individuals.

Video Relay Service (VRS)

Video Relay Service (VRS) is one of the most exciting developments in the field of

telecommunication relay services, and it has experienced tremendous growth throughout Utah and nationally. VRS is a method of communication that allows a person who uses sign language to connect with a Video Interpreter (VI) who is certified in American Sign Language. The VI is obtained using a computer or television, a web camera, and a high-speed Internet connection such as DSL, cable modem, or ISDN. The VI works from a remote location and can see the person who is deaf on a screen. The phone conversation is interpreted real time and allows people who are deaf to clearly express their message in their own language without delay. Sprint and Communication Service for the Deaf were the first to establish and offer a video relay service in July, 2002 and can be reached at www.utvrs.com. In 2003, Sorenson Communications, a local Utah company, entered the VRS arena and quickly became the largest carrier. At the conclusion of fiscal year 2006 Sorenson has 48 VRS call centers across the US. They have expanded their VRS call center locations in order to not use up too many certified interpreters in the one particular state area. Sorenson created the only equipment solely for the use of people who are deaf rather than retrofitting existing equipment. Sorenson VRS can be accessed at www.sorensonvrs.com.

Internet Protocol Relay (IP Relay)

People who have hearing or speech disabilities may make telephone calls on their computer through the use of an internet connection with IP Relay. This can be used in place of a text telephone (TTY) and a telephone or using VRS. IP Relay can be accessed through providers like Sprint at www.sprintip.com and Sorenson at www.siprelay.com. Benefits of IP Relay include that it is available to anyone who has access to the Internet via a computer, a personal digital assistant, Web-capable telephone, or some other device and not necessarily with a high-speed connection. IP Relay is available when a TTY may not be available, and some users say it is easier than a TTY because typing on a computer keyboard can be faster. One can see more of the conversation than can be viewed on a TTY screen, and the conversation can be printed out or saved. IP Relay is available 24 hours a day, 7 days a week just as traditional TRS is available.

Funding

Funding for Relay Utah, the equipment distribution program, and the interpreter training programs all come from a monthly surcharge on Utah residential and business telephone lines, with a mandated maximum not to exceed \$.25 per month per land telephone line. This rate is set by the Public Service Commission rule, and the current surcharge is set at \$.10 per line per month. During fiscal year 2006 the total amount received from the local exchange carriers was approximately \$1,355,778. The surcharge collections pay for the Relay Utah services, finances the equipment distribution programs, pays for outreach and education, pays for the amounts awarded to the interpreter training programs, as well as covers the administrative costs related to all the above. During FY 2006, the Commission spent \$1,476,387. The Commission has relied on a surplus to make up the difference between expenditures and revenues.

Local exchange carriers that remitted a surcharge to the State of Utah's Public Service Commission in FY 06 include:

AT&T Communications
Albion Telephone Company, Inc.
All West/World Connect

Gunnison Telephone Company
Hanksville Telecom
Integra Telecom of Utah, Inc.

American Fiber Network	MCI Worldcom
Beehive Telephone Company	Manti Telephone Company
Bear Lake Communications	Qwest Corporation SBC Telecom
Carbon/Emery Telecom, Inc.	Skyline Telecom
Central Utah Telephone, Inc.	South Central Utah Telephone
Century Telephone	TCG Utah
Citizens Telecom Company of Utah	UBTA-UBET Communications
Comcast Phone of Utah	Union Telephone Company
Comm. South Companies	Universal Access, Inc.
Direct Comm. Cedar Valley, LLC	Vartec Telecom, Inc.
Electric Lightwave	XO Utah, Inc.
Emery Telecom	Z-Tel, Inc.
Farmers Telephone Company, Inc.	
Frontier Navajo Comm. Co.	

Community Feedback

Utah Code 54-8b-10 (7) states, “The Commission shall solicit the advice, counsel, and physical assistance of severely hearing or speech impaired persons and organizations serving them in the design and implementation of the program.” In order to comply with this rule, in FY 06 the Public Service Commission held quarterly meetings with the Relay Utah Consumer Council (“RUCC”) which includes representatives of different groups or organizations, and individuals who are deaf, hard of hearing, or speech disabled and also individuals who use the services provided by the PSC.

The RUCC meetings are held in conjunction with Sprint due to its being the Telecommunications Relay Services provider for the State of Utah since 2000. The RUCC members are active in providing feedback and ideas of how to best meet the needs of relay consumers in Utah. Through these meetings and continued contact with relay consumers, the Commission is able to gather information for better implementation of TRS and of the equipment distribution program.

The Commission also held four open house meetings across the state in Taylorsville, Orem, Logan, and St. George during Fiscal Year 2006. Open houses provide a great opportunity to educate relay users and equipment distribution recipients about newer technologies and provide an opportunity to receive feedback as well as answer questions.

Another accomplishment this past year was the collection of surveys regarding the Captioned Telephone. Approximately 135 surveys were sent out and 67 were returned, about half, which seems to be a great achievement in and of itself due to typical survey return rates usually are at about 20%. Other states were very interested in Utah’s survey itself, as well as the results, due to the CapTel still being a relatively new equipment option. The Commission was pleased to see one statistic that about 81% of the respondents “enjoy” using their CapTel, six said they don’t enjoy their CapTel, five said they were neutral, and two did not respond. Most importantly the Commission was able to discover who needed retraining or more information as well as was able to provide feedback to the creator of the device and the provider of the service.

The Public Service Commission is committed to improving and maintaining the quality of Relay Utah services. TRS is experiencing many changes and with the newer services of VRS, CapTel, and IP Relay, the Commission is trying to be proactive and provide the most functionally

equivalent forms of telecommunications available for people who are deaf, hard of hearing, and/or speech disabled. All of the new rules from the Federal Communications Commission and the improved services that have evolved continue to bring Relay Utah closer to what standard telephone users experience and enjoy every day. These new rules and services expand Relay Utah to many new groups who were unable to use Telecommunication Relay Services in the past. The Commission looks forward to the development of new and improved technologies as well as better customer service in order to best serve those in need.

Appendix P: State Legislation and Utah PSC Rules Establishing TRS Program

54-8b-10. Imposing a surcharge to provide hearing and speech impaired persons with telecommunication devices -- Definitions -- Procedures for establishing program -- Surcharge -- Administration and disposition of surcharge moneys.

- (1) As used in this section:
 - (a) "Certified deaf or severely hearing or speech impaired person" means any state resident who:
 - (i) is so certified by:
 - (A) a licensed physician;
 - (B) an otolaryngologist;
 - (C) a speech language pathologist;
 - (D) an audiologist; or
 - (E) a qualified state agency; and
 - (ii) qualifies for assistance under any low income public assistance program administered by a state agency.
 - (b) "Certified interpreter" means a person who is a certified interpreter under Title 53A, Chapter 26a, Interpreter Services for the Hearing Impaired Act.
 - (c) (i) "Telecommunication device" means any mechanical adaptation device that enables a deaf or severely hearing or speech impaired person to use the telephone.
 - (ii) "Telecommunication device" includes:
 - (A) telecommunication devices for the deaf (TDD);
 - (B) telephone amplifiers;
 - (C) telephone signal devices;
 - (D) artificial larynxes; and
 - (E) adaptive equipment for TDD keyboard access.
 - (2) The commission shall hold hearings to establish a program whereby any certified deaf or severely hearing or speech impaired customer of a telephone corporation that provides service through a local exchange or of a wireless telecommunications provider may obtain a telecommunication device capable of serving the customer at no charge to the customer beyond the rate for basic service.
 - (3) (a) The program described in Subsection (2) shall provide a dual party relay system using third party intervention to connect a certified deaf or severely hearing or speech impaired person with a normal hearing person by way of telecommunication devices designed for that purpose.
 - (b) The commission may, by rule, establish the type of telecommunications device to be provided to ensure functional equivalence.
 - (4) (a) The commission shall impose a surcharge on each residence and business access line of each customer to the local exchange of any telephone corporation providing such lines in this state to cover the costs of:
 - (i) the program described in Subsection (2); and
 - (ii) payments made under Subsection (5).
 - (b) The commission shall establish by rule the amount to be charged under this section, which may not exceed 25 cents per residence and business access line.
 - (c) The telephone corporation shall collect the surcharge from its customers and transfer the money collected to the commission under rules adopted by the commission.
 - (d) The surcharge shall be separately identified on customer bills.
-
- (5) (a) Any money collected from the surcharge imposed under Subsection (4) shall be

deposited in the state treasury as dedicated credits to be administered as determined by the Public Service Commission.

(b) These dedicated credits may be used only:

- (i) for the purchase, maintenance, repair, and distribution of telecommunication devices;
- (ii) for the acquisition, operation, maintenance, and repair of a dual party relay system;
- (iii) to reimburse telephone corporations for the expenses incurred in collecting and transferring to the commission the surcharge imposed by the commission;
- (iv) for the general administration of the program;
- (v) to train persons in the use of telecommunications devices; and
- (vi) by the commission to contract, in compliance with Title 63, Chapter 56, Utah Procurement Code, with:

(A) an institution within the state system of higher education listed in Section **53B-1-102** for a program approved by the Board of Regents that trains persons to qualify as certified interpreters; or

(B) the Division of Services to the Deaf and Hard of Hearing for a program that trains persons to qualify as certified interpreters.

(c) (i) The commission shall make rules under Title 63, Chapter 46a, Utah Administrative Rulemaking Act, for the administration of monies under Subsection (5)(b)(vi).

(ii) In the initial rulemaking to determine the administration of monies under Subsection (5)(b)(vi), the commission shall give notice and hold a public hearing.

(d) Monies received by the commission under Subsection (4) are nonlapsing.

(6) (a) The telephone surcharge need not be collected by a local exchange company if the amount collected would be less than the actual administrative costs of the collection.

(b) If Subsection (6)(a) applies, the local exchange company shall submit to the commission, in lieu of the revenue from the surcharge collection, a breakdown of the anticipated costs and the expected revenue from the collection, showing that the costs exceed the revenue.

(7) The commission shall solicit the advice, counsel, and physical assistance of severely hearing or speech impaired persons and the organizations serving them in the design and implementation of the program.

Amended by Chapter 68, 2007 General Session

Public Service Commission of Utah Rule R746-343. Rule for Deaf, Severely Hearing or Speech Impaired Person.

As in effect on September 1, 2007

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[R746-343-1. Purpose and Authority.](#)

This rule is to establish a program as required in Section 54-8b-10 which will provide telecommunication devices to certified deaf, or severely hearing or speech impaired persons, who qualify under certain conditions, and to provide a dual relay system using third party intervention to connect deaf or severely hearing or speech impaired persons with normal hearing persons by way of telecommunication devices.

[R746-343-2. Definitions.](#)

A. Definitions

1. "Applicant" is a person applying for a Telecommunication Device for the Deaf, signal device, or other communication device.

2. "Audiologist" is a person who has a Master's or Doctoral degree in Audiology, is licensed in Audiology in Utah, and holds the Certificate of Clinic Competence in Audiology from the American Speech/Language/Hearing

Association, or its equivalent.

3. "Deaf" is a hearing loss that requires the use of a TDD to communicate effectively on the telephone.
4. "Provider" is a service provider who agrees to be, if determined by the Public Service Commission, the administrator of the program or a portion of the program.
5. "Distribution center" is a facility authorized by the provider to distribute TDDs and signal devices, personal communicators, or other devices required by a recipient to communicate effectively on the telephone.
6. "Dual relay system" is the provision of voice and teletype communication between users of TDDs and other parties.
7. "Otolaryngologist" is a licensed physician specializing in ear, nose and throat medicine.
8. "Recipient" is a person who receives a TDD, signal device, personal communicator, or other device to communicate effectively on the telephone.
9. "Speech language pathologist" is a person who has a Master's or Doctoral degree in Speech Language Pathology in Utah, and holds the Certificate of Clinical Competence in Speech/Language Pathology from the American Speech Language Hearing Association, or its equivalent.
10. "Severely hearing impaired" is a hearing loss that requires use of TDD to communicate effectively on the telephone.
11. "Severely Speech Impaired" is a speech handicap, or disorder, that renders speech on an ordinary telephone unintelligible.
12. "Signal device" is a mechanical device that alerts a deaf, deaf-blind, or severely hearing impaired person of an incoming telephone call.
13. "Telecommunications Device for the Deaf, or TDD, is an electrical device for use with a telephone that utilizes a key board. It may also have an acoustic coupler, display screen or braille display to transmit and receive messages.
14. "Telephone relay center" is a facility administered by the provider to provide dual relay service.
15. "Commission" is the Utah Public Service Commission.

[R746-343-3. Eligibility Requirements.](#)

A. An applicant is eligible if he is deaf, severely hearing impaired, or severely speech impaired and is eligible for assistance under a low income public assistance program administered by the Department of Human Services. The impairment must be established by the certification on an application form by a person who is permitted to practice medicine in Utah, an audiologist, otolaryngologist, speech/language pathologist, or qualified personnel within a state agency. The applicant must provide evidence that they are currently eligible, though it is not necessary that they be participating, for public assistance under one of the following programs:

1. Aid to Families with Dependent Children;
2. Emergency Work Program;
3. Food Stamps;

4. General Assistance;
5. Home Energy Assistance Target Program;
6. Medical Assistance;
7. Refugee Assistance; or
8. Supplemental Security Income.

C. The provider may require additional documentation to determine applicant's eligibility.

D. During the training session required in Section R746-343-8, Training, the applicant must demonstrate an ability to send and receive messages with a TDD or other appropriate devices.

R746-343-4. Approval of an Application.

A. Approved Application--

1. When an original application has been approved, the provider shall inform the applicant in writing of:

- a. when the original application has been approved;
- b. the location of the distribution center or designated place where the applicant may receive a TDD;
- c. the date and time of the training session as required in Section R746-343-8.

2. When the request for a replacement TDD, signal device, or other device has been approved, the provider or the distribution center shall inform the recipient of the procedure for obtaining a replacement device.

B. Denied Applications--If an original application or replacement request is denied, the provider shall inform the applicant in writing of the reasons for the denial and of applicable procedures for appeal. Denial notices shall be sent by certified mail with return receipt. The notice shall be accompanied by instructions on the review process.

R746-343-5. Review by the Provider.

A. An applicant or recipient whose request for an original or replacement device has been denied may request that the provider review the decision.

B. The request for review shall be in writing and shall specify the basis for review and must be received by the provider within 30 days of the receipt of the notice of denial.

C. Within ten days of receiving the request for review, the provider shall inform the applicant or recipient in writing of the disposition of the request.

R746-343-6. Review by the Commission.

A. Within 20 days of the notice of denial from the provider for review, the applicant or recipient may request in writing a hearing by the Commission. The request shall specify the reasons for challenging the decision.

R746-343-7. Distribution Process.

A. Distribution Centers shall:

1. Upon notice from the provider, distribute TDDs, signal devices, or other specified devices, to persons

determined eligible under Section R746-343-3, Eligibility Requirements, and who reside in Utah;

2. Require each recipient or legal guardian to sign an agreement, Condition of Acceptance, form supplied by the provider;

3. Forward completed application forms and agreement forms to the provider;

4. Inform the provider of those applicants who fail to report for training and receipt of devices.

B. The provider shall implement a program to facilitate distribution of devices and provide training as required.

C. Neither the distribution center nor the provider shall be responsible for providing replacement paper for devices, the payment of the recipient's monthly telephone bill, purchase or lease cost of recipient's telephone, or the cost of replacement light bulbs for signal devices.

R746-343-8. Training.

A. The provider shall be responsible for seeing that training is provided to each recipient and legal guardian, or significant other, in accordance with guidelines established by the provider.

R746-343-9. Replacement Devices.

A. The distribution center shall provide devices to persons determined by the provider to be eligible under Sections R746-343-3, Eligibility Requirements, and R746-343-8, Training, accept devices that need repair, and deliver devices returned by recipients to a repair center designated by the provider.

R746-343-10. Ownership and Liability.

A. TDDs, signal devices, and other devices provided by this program are the property of the state.

B. A recipient or guardian shall return a TDD, signal device, or other device, to the provider or distribution center when the recipient no longer intends to reside in Utah, is no longer qualified for the program, does not need the device, or has been notified by the provider to return the device.

C. Other than normal usage, recipients are liable for damage to or loss of a device issued under conditions of acceptance.

R746-343-11. Out of State Use.

No person shall remove a TDD, signal device, or other device from the state for a period longer than 90 days without written permission of the provider.

R746-343-12. Dual Relay Service--Telephone Relay Center.

A. A telephone relay center shall provide dual relay service seven days a week, 24 hours a day, including holidays.

B. A telephone relay center shall hire operators with specialized communication skills who shall be salaried employees.

C. A telephone relay center shall require the operators to relay each message accurately, except as otherwise specifically provided in Section R746-343-14, Criminal Activity.

R746-343-13. Confidentiality and Privacy Requirements.

A. Except as otherwise specifically provided in Section R746-343-14, Criminal Activity, a telephone relay center shall protect the privacy of persons to whom relay services are provided and shall require each operator to maintain the confidentiality of each telephone message.

B. The confidentiality and privacy of persons to whom relay services are provided will be protected by means of the following:

1. The relay center shall not maintain any form of permanent copies of messages relayed by their operators or allow the content of telephone messages relayed by their operators to be communicated to non-staff members.

2. Persons using the relay system shall not be required to provide identifying information until the party they are calling is on line, and shall only be required to identify themselves to the extent necessary to fulfill the purpose of their call.

3. Relay operators shall not leave messages with third parties unless instructed to do so by the person making the call.

4. Persons using the relay system may file complaints about the relay service to the telephone relay center or the provider, who shall review each complaint.

R746-343-14. Criminal Activity.

A. Relay operators shall not knowingly transmit telephone messages that are made in furtherance of a criminal activity as defined by Utah or federal law.

B. The confidentiality and privacy requirements of Section R746-343-13, Confidentiality and Privacy Requirements, do not apply to telephone conversations made in furtherance of a criminal activity as defined by Utah or federal law.

R746-343-15. Surcharge.

A. The surcharge will be placed on access lines as determined by the count of main stations or its equivalent.

B. The surcharge established by the Commission in accordance with Subsection 54-8b-10(4) is \$.10.

C. Subject to Subsection R746-343-15(D), the telephone surcharge will be collected by each local exchange company providing basic service in Utah and submitted, less administrative cost, to the Public Service Commission on a quarterly basis.

D. The provider will submit its budget for annual review by the Public Service Commission.

E. The telephone surcharge need not be collected by a local exchange company if the amount collected would be less than the actual administrative costs of that collection. In that case, the local exchange company shall submit to the Commission, in lieu of the revenue from the surcharge collection, a breakdown of the anticipated costs and the expected revenue from the collection showing that the costs exceed the revenue.

KEY

AFDC, physically handicapped, rates, telecommunications

Date of Enactment or Last Substantive Amendment

July 1, 2000

Notice of Continuation

December 13, 2002

Authorizing, Implemented, or Interpreted Law

54-8b-10

Appendix Q: Copies of Complaint Logs from 2002 – 2007

June 21, 2003

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in CC Docket 98-67 by the Federal Communications Commission (FCC) along with the order dated_____, the Public Service Commission of Utah hereby submits the original and four (4) copies of Utah's TRS Complaints Log. Included is the original plus four (4) copies of the Consumer Complaints Log as well as reports from Sprint, the state's TRS provider. Copies of both the Consumer Complaints Log from the state of Utah, and Sprint have been sent to Erica Meyers with the Consumer & Governmental Affairs Bureau, including a diskette containing the items as requested. In addition, a diskette containing the aforementioned documents, have been forwarded to the FCC's Copy Contractor.

For the period of June 1, 2002 through May 31, 2003, Sprint received a total of thirteen (13) customer complaints that were filed with supervisors at one of the eleven Sprint TRS Centers. All of the complaints received by the Administrator and the TRS Specialist with the Utah Public Service Commission were referred to Sprint and are included in their complaint records. All of the complaints were resolved in a timely fashion, and as far as we are aware, none of the complaints have escalated into action for the FCC.

Over the last two years the Utah Public Service Commission issued surveys to a majority of Relay Utah consumers. Approximately 100 surveys were returned each year and the Commission found that 95% of the respondents were satisfied with Relay Utah, whereas 5% of the respondents were dissatisfied. The respondents who were dissatisfied indicated no reasons for the dissatisfaction. The PSC has been actively gathering feedback from the Utah Relay users to help the Commission ensure a quality relay service for our state and continues to meet quarterly with the Relay Utah Consumer Council.

The Utah Public Service Commission, in the best interest of Relay Utah, continues to work in conjunction with the FCC and strives to be proactive in order to provide the best possible relay service for Utah residents.

Sincerely,

Julie Orchard
Commission Secretary
TRS Administrator
(801) 530-6713
(801) 530-6796
jorchard@utah.gov

Attachment #1: Complaint Log Summary for Period of June 1, 2002 – May 31, 2003
Attachment #2: Summary of Complaints for Period of June 1, 2002 – May 31, 2003
Attachment #3: Annual Tally Report for Period of June 1, 2002 – May 31, 2003

Attachment #1
Sprint Complaint Log Summary
June 1, 2002 – May 31, 2003

June 2002 – No Complaints

1)

6/4/02

Category #35—Other

Nature of Complaint— The customer is a TTY telebraille user who was attempting to call Utah Relay's toll free 800 number or 711. The customer could not reach relay this morning for 30 minutes from his residential number. He has not experienced this problem in the past. The customer was also upset because he was not aware of the dedicated telebraille number for Utah Relay. He felt he should have been contacted with the dedicated telebraille number. Customer Service apologized to the customer for the problems he encountered. He did not indicate any problems with relay. Customer Service suggested there might have been local phone service problems when he called earlier. Customer requested contact later that day after 4:30 pm or on 6-5-02 at 9:00 am. Customer also requested a follow up call from Kelli Toohill. She is an employee of UT PSC. The customer reported the problem to the PSC earlier that day.

7/1/02

Resolution— A representative has communicated with the customer on several occasions discussing several issues. The representative also visited the customer's residence on 6-25-03 to discuss and evaluate the situation further. Prior to the home visit, the majority of the issues had been resolved by TRS customer service. The customer was given the CDB profile and the customer updated the information. The representative faxed CDB to customer service a few days later. The problem started when he began using a different number. The new number did not have the CDB profile and received incorrect branding. He wishes to be branded as a Deaf and blind user and wants to receive messages at 60 wpm. It was determined that it is best to brand his CDB as a TTY user and add a note stating that the customer is Deaf and blind. The customer was concerned about outreach to the Deaf and blind. The representative reassured the customer that a meeting for deaf and blind users would be set up in the next couple of months. At this time all issues have been resolved.

2)

6/13/02

Category #21—Other Problem Type Complaint

Nature of Complaint—CA interrupted the customer while the customer was trying to type. The customer typed a message for the CA to leave on the answering machine and then typed "SKSK" at the end. CA sent macro stating that she was re-dialing the number in order to leave the customer's message, but the customer had not stopped typing. CA did not hit the space bar to stop macro. Customer Service apologized to the customer and thanked the customer for the feedback.

6/13/02

Resolution—The CA was coached on hitting the space bar immediately when the TTY starts to type. She said she understood. The customer was informed that the CA had received coaching and the customer was satisfied with the intervention.

3)

6/24/02

Category #17—Agent Was Rude

Nature of Complaint—The voice caller was upset about dialing 711 and hearing TTY tones. The customer was also upset that when dialing 711 in California the operators "have an attitude". The customer did not want to receive a follow-up call.

6/24/02

Resolution—Offered to have Customer Service brand his phone number to avoid the TTY tones and suggested that he call the 888 voice relay number. Apologized for the rude operators with attitudes and asked him to get the CA number or talk to the supervisor if it happens in the future.

July 2002

4)

7/15/02

Category #6—Poor Spelling

Nature of Complaint—The customer called to say she was on an important call and she had a hard time understanding the CA's typing. She would have to ask the other person to repeat what was said. Eventually, the customer had to ask the other party, "Is this correct?" or "Is this right?" The customer was unsure if the other party was speaking too fast. However, if this was the problem, the customer felt that the CA should have requested the other party to speak more slowly. An apology was given to the customer and reassurance that her concern would be forwarded to the appropriate center. The customer requested no further contact.

7/19/02

Resolution – Spoke with the CA. She did not remember the call. She thought there could have been a "garbling" problem. CA can usually keep up with her typing and is able to "pace" when needed. Coached her to continue with those procedures in the future.

5)

7/18/02

Category #26—Garbled Message

Nature of Complaint—TTY customer was experiencing garbling when dialing to Relay Utah. Customer could not read the relay agent's typing. Apologized to the customer for the problem and let her know that a ticket would be opened to help resolve the issue. Trouble ticket #298936 was opened for resolution.

9/16/02

Resolution— The account manager was unable to reach the customer after several attempts to contact her. Account manager attempted unsuccessfully to call her on 9/3/03, 9/12/02, and 9/18/02. Customer did not submit a CA number so it was difficult to track the source of the problem. Customer Service did not have Turbo Code enabled when the customer called.

7/15/02

6) Category #17—Agent Was Rude

7) Category #21—Other Service Type:

Nature of Complaint— On the previous call, the outbound voice customer indicated that CA1800F was speaking too fast and slurring her speech. The customer could not understand the CA so asked her to repeat the message. The CA did not repeat the message. The customer reported, "Previous CA's have been willing to repeat the message for me. I am very familiar with relay and how it works." The customer was very frustrated with this CA. The customer reported that the CA just typed her request to repeat the message to the other party. An apology was given for the inconvenience. Customer service worker asked if the GA (go ahead) had been given. Customer thought it had. Customer service agent explained that once a GA had been given, the CA cannot repeat the message. The customer understood, but still felt that the CA was rude, abrupt, and speaking too fast. She went on to say that the CA told her that their conversation was being recorded. CA was listening to the conversation and shook her head indicating that she had not said the call was being recorded. The customer service worker thanked the caller for bringing her concern to the attention of Relay Utah and told her that a complaint would be filed.

7-31-02

Resolution— Followed up with the CA. Commended the CA for staying within relay protocol and for her attempts to redirect the voice caller in speaking directly to the TTY caller. CA felt that she had spoken clearly and in a "normal" style, but she was coached on speaking clearly and being conscience of her speech patterns.

August 2002—No Complaints

September 2002 – No Complaints

October 2002 – No Complaints

November 2002

8)

11/1/02

Category #5—Agent Disconnected Caller

Nature of Complaint—Customer called and said CA 1811 hung up on the TTY user. The operator expressed concern for the hang up and indicated the current CA would be happy to process customers call.

11/11/02

Resolution—CA did not remember the call due to the amount of time that had lapsed between the call and the follow up. CA understands the importance of not disconnecting customers.

9)

11/9/02

Category #17—Agent Was Rude

Nature of Complaint—The voice customer was concerned about the CA's attitude. The customer said, "Operator told me I waited too long. I didn't mind her telling me but it was the attitude. It was 'smitty'. The TTY person must have typed because she kept repeating in a harsh voice 'Can you read me now?' I advised her that her supervisor would be notified and she would be coached." The customer service worker apologized for the situation. Customer did not want follow up.

11/16/02

Resolution— The CA remembered the call. The voice customer was not responding quickly and the TTY user kept typing "Why so long? Can you read me now?" The CA stated that the TTY user kept repeating the phrase and began to use exclamation marks, therefore the CA was adding emotion to the message. CA was coached on using softer tones and still adding emotion to the message.

December 2002—No Complaints

January 2003

10)

1/14/03

Category #4—Didn't Keep Customer Informed

Nature of Complaint—The customer said the CA was "incompetent" and seemed new or confused. When the customer wanted to leave a message on an answering machine, the CA did not keep the customer informed about what was happening. The macros (leaving message) and (answering mach. playing) were not sent. Customer Service apologized to the customer and assured them that the CA would be trained on proper procedure for answering machines. The customer did not want to be contacted.

1/05/03

Resolution—The supervisor talked to the CA and the CA said she left the message for the customer 5 times and she was sending the macros. However, the customer said she was not sending them. The supervisor tested the CA on the macros and she answered correctly.

11)

1/11/03

Category #17—Agent Was Rude

Nature of Complaint—The voice user complained that the CA was laughing about the conversation and made comments about the content of the conversation. CA refused to give her CA number, but then gave the number reluctantly. Customer Service apologized to the customer for the inconvenience and informed her that the agent would be addressed regarding her behavior.

1/5/03

Resolution—Supervisor met with the CA. The CA was coached on the importance of remaining transparent and

demonstrating professionalism when processing relay calls. Disciplinary action will be taken in this case.

February 2003—No Complaints

March 2003—No Complaints

April 2003—No Complaints

May 2003

12)

5/1/03

Category #VCO Procedures Not Followed

Nature of Complaint—A VCO customer received a call from his friend, and on the first attempt the operator didn't make the connection to his VCO phone. The inbound caller asked the operator to redial, and the second time the VCO customer answered with typing and the call was able to connect. His CDB note states that he uses VCO. Customer says this agent needs coaching and Customer Service assured the agent would be coached. Customer does not want follow-up contact.

5/10/03

Resolution— The supervisor coached the CA on following instructions in the customer notes.

13)

5/9/03

Category #2—Didn't Follow Database Instructions

Nature of Complaint—Customer said he had just made a call through UT relay and when he said, "Please call (friend's name)", the operator kept waiting and waiting and asked the customer to repeat his request. The agent didn't seem to have any clue what to do to get the customer's Frequently-Dialed Number from the system. Customer's notes do instruct "Uses Frequently-Dialed Numbers". Customer Service told the customer that this concern would be sent to the call center supervisor. Customer did not want follow-up contact.

5/15/03

Resolution—Coached agent on proper procedures for Frequently-Dialed Numbers.

Attachment # 3
Annual Tally Report
June 1, 2002 – May 31, 2003

Total Complaints by Category

<u>Category</u>	<u>Description of Category</u>	<u>Number of Complaints</u>	<u>Dates</u>
#2	Didn't Follow Database Instructions	1	5-9-03
#4	Didn't Keep Customer Informed	1	1-14-03
#5	Agent Disconnected Caller	2	11-1-02 1-11-03
#6	Poor Spelling	1	7-15-02
#11	VCO Procedures Not Followed	1	5-1-03
#17	Agent Was Rude	3	6-24-02 7-15-02 11-9-02 1-11-03
#21	Other Service Type	2	7-15-02 6-13-02
#26	Garbled Message	1	7-18-02
#35	Other	1	6-4-02

Total Number of Complaints = 13

June 24, 2004

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in CC Docket 98-67 by the Federal Communications Commission (FCC) along with the order dated June 2, 2004, the Public Service Commission of Utah hereby submits the original and four (4) copies of Utah's TRS Complaints Log. Included is the original plus four (4) copies of the Consumer Complaints Log as well as reports from Sprint, the state's TRS provider. Copies of both the Consumer Complaints Log from the state of Utah, and Sprint have been sent to Erica Meyers with the Consumer & Governmental Affairs Bureau, including a diskette containing the items as requested. In addition, a diskette containing the aforementioned documents, have been forwarded to the FCC's Copy Contractor.

For the period of June 1, 2003 through May 31, 2004, Sprint received a total of four (4) customer complaints that were filed with supervisors at Sprint TRS Centers. All of these complaints were resolved in a timely fashion, and as far as we are aware, none of the complaints have escalated into action for the FCC.

In March, the Public Service Commission held an Open House in Logan, Provo, St. George, and Taylorsville, Utah to answer any questions regarding Relay Utah and to get feedback on advertising issues as the Commission has recently awarded an outreach contract to an advertising, marketing, and public relations firm, Penna Powers Brian and Hayes.

The Utah Public Service Commission, in the best interest of Relay Utah, continues to work in conjunction with the FCC and strives to be proactive in order to provide the best possible relay service for Utah residents.

Sincerely,

Julie Orchard
Commission Secretary
Public Service Commission
Heber M. Wells Building, 4th Floor
Salt Lake City, UT 84111
(801) 530-6713 (V)
(801) 530-6796 (fax)
jorchard@utah.gov

cc: Erica Myers
Federal Communications Commission
Consumer & Government Affairs Bureau
445 12th Street, SW, Room 5-C212
Washington, D.C. 20554

Attachment # 1: Sprint Complaint Log Summary
Attachment # 2: Sprint Summary of Complaints
Attachment # 3: Utah Public Service Commission Complaint Log Summary

Attachment #1
Complaint Log Summary
June 1, 2003 – May 31, 2004

June, 2003 – no complaints

July, 2003 – no complaints

August, 2003 – no complaints

September, 2003

9/2/03

Category # 4 – Didn't Keep Customer Informed

Nature of Complaint – Caller said the agent did not keep the caller informed during the call.

9/2/03

Resolution – Coached CA to call for help, raise assist flag whenever help is needed to set up the call properly.

9/30/03

Category # 3 – Didn't Follow Customer Instructions

Nature of Complaint - The caller tried to interrupt CA in the middle of recording to request for a live representative. CA ignored request and kept on typing the whole recording.

October, 2003 – no complaints

November, 2003 – no complaints

December, 2003

12/6/03

Category # 17 – Agent Was Rude

Nature of Complaint – CA did not explain relay services and CA was extremely rude.

12/15/03

Resolution – Appropriate action taken.

January, 2004

1/20/04

Category #3 – Didn't Follow Customer Instructions

CA did not follow customer instructions. He also stated that the CA was a slow typist.

Resolution – Coached CA on following customer instructions. Reviewed VCO to voice answering machine procedure.

February, 2004 – no complaints

March, 2004 – no complaints

April, 2004 – no complaints

May, 2004 – no complaints

Attachment # 2
Summary Log for June 1, 2003 – May 31, 2004
Relay Utah

For the period of June 1, 2003 through May 31, 2004, Sprint received a total of (4) four customer complaints. All four complaints were filed with supervisors at one of the eleven Sprint TRS centers. All of these complaints were resolved in a timely fashion. None of these complaints were escalated for action to the Utah Public Service Commission or to the Federal Communications Commission.

Attachment #3
State of Utah
TRS Complaint Log
June 1, 2003 – May 31, 2004

Month, Year	Number of complaints
June, 2003	0
July, 2003	0
August, 2003	0
September, 2003	2
October, 2003	0
November, 2003	0
December, 2003	1
January, 2004	1
February, 2004	0
March, 2004	0
April, 2004	0
May, 2004	0
Total Complaints	4

June 28, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the original and four (4) copies of the State of Utah's TRS Complaints Log. Included are the original and four (4) copies of the Consumer Complaints Log that summarizes reports from Sprint, the state's TRS provider, and from Sorenson, a VRS provider. A diskette containing the aforementioned documents has been included as well. Copies of the Log Summaries from the State of Utah are also being sent to Dana Jackson with the Consumer & Governmental Affairs Bureau, including a diskette containing the items as requested.

For the period of June 1, 2004 through May 31, 2005, Sprint processed 313,235 outbound TRS calls and received 5 (five) customer complaints. For that same period, Sprint received 10 (ten) complaints for CapTel which comprised for a total of 32,667 outbound calls. Therefore, Sprint received a total of 15 (fifteen) customer complaints that were filed with supervisors at one of the Sprint TRS centers of 345,902 total calls which is 0.00435% of all calls. Sorenson VRS processed 79,683 calls and received 10 (ten) customer complaints which represents about 0.0126% of all video relay calls. Any complaints received by the Commission Secretary and the TRS Specialist with the Utah Public Service Commission were referred to Sprint or to Sorenson and are included in their complaint records. All of the complaints were resolved in a timely fashion, and as far as the Commission is aware, none of the complaints escalated into action for the FCC.

Over the last few years, the Utah Public Service Commission has issued surveys to Relay Utah consumers. Approximately 100 surveys were returned each year and the Commission found that 95% of the respondents were satisfied with Relay Utah, whereas 5% of the respondents were dissatisfied. The respondents who were dissatisfied indicated no reasons for the dissatisfaction.

The Commission released a Request for Proposal in 2004 for a TRS provider for the contract period January 28, 2005 to January 28, 2008. The Commission actively gathered feedback from the Relay Utah users during the RFP process and awarded the TRS contract to Sprint. The Utah Public Service Commission was able to secure a full time Sprint Account Manager working full time in Utah. The new Account Manager has started working closely with the Commission and is in the process of scheduling Town Hall Meetings with the TRS Specialist in September, 2005. The purpose of the Town Hall Meetings is to explain the complaint process, Sprint TRS products, and to solicit more feedback about TRS.

In the next month, Relay Utah will have another means to collect complaints about TRS, VRS, CapTel, etc. The Commission is adding a complaint form onto two different websites, the Relay Utah website (www.relayutah.gov) as well as the Utah Public Service Commission website (www.psc.state.ut.us).

The Utah Public Service Commission continues to work in conjunction with the FCC and strives to be proactive to providing the best possible relay service for residents of Utah.

Sincerely,

Julie Orchard
Commission Secretary
TRS Administrator
(801) 530-6713
(801) 530-6796
jorchard@utah.gov

Attachment #1: Complaint Log Summary for Period of June 1, 2004 – May 31, 2005
Attachment #2: Summary of Complaints for Period of June 1, 2004 – May 31, 2005
Attachment #3: Annual Tally Report for Period of June 1, 2004 – May 31, 2005

Attachment #1

Relay Utah - Complaint Log Summary

Sprint categorizes each of the complaints in the following manner:

Number	Category
00	Answer Wait Time
01	Dial Out Time
02	Didn't Follow Database Instructions
03	Didn't Follow Customer Instructions
04	Didn't Keep Customer Informed
05	Agent Disconnected Caller
06	Poor Spelling
07	Typing Speed/Accuracy
08	Poor Voice Tone
09	Everything Relayed
10	HCO Procedures Not Followed
11	VCO Procedures Not Followed
12	Two-line Procedures Not Followed
13	Background Noise Not Typed
14	Feelings Not Described
15	Recording Feature Not Used
16	Noise in Center
17	Agent Was Rude
18	Problem Answering Machine
19	Spanish Service
20	Speech to Speech
21	Other Problem Type Complaint
22	Lost Branding
23	Charged for Local Call
24	Trouble Linking Up
25	Line Disconnected
26	Garbled Message
27	Database Not Available
28	Split Screen
29	Other Technical Type Complaint
30	Rates
31	OSD
32	No 900 Number
33	Carrier of Choice
34	Network Recording
35	Other
57	Caller ID
58	Regional 800 Calls
59	Transmission

Attachment #1 (continued)
Relay Utah – Complaint Log Summary
June 1, 2004 – May 31, 2005

TRS Complaints

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
6/18/04	21	Customer stated that he has called into Relay and requested a supervisor to transfer him to a Spanish speaking agent, however, he never got any response from a supervisor and apparently was disconnected. Requests transfer to Spanish Relay.	6/18/04	Apologized to the customer for the inconvenience. Unable to follow up on supervisor's ID or name not given. Transferred to Spanish Relay.
11/27/04	09	Customer asked to dial a bank and get a live person. While holding for live person, customer was asked for her account number, which she provided, and her pin number. She had never been asked for her PIN before when calling the bank. She refused to give PIN and hung up. Customer wonders why CA asked for the info. Thanked customer, said would follow up immediately with CA. Follow up was requested by phone.	11/27/04	Agent remembered call clearly. Agent dialed and waited for live rep., but recording would not forward to live agent without entering info. Agent asked for info and redialed to get live rep. Coached agent on importance of keeping customer informed. Called customer back. Customer said again that she had never given a CA her PIN. Customer was satisfied with resolution.
11/28/04	21	Inbound TTY asked for supervisor by name. When I identified myself the TTY user asked for my gender and if I know named supervisor. After confirming that I was a female, the TTY user typed an obscene sentence. Asked if there was a problem I could help them with and the TTY user hung up.	11/29/04	Complaint noted. No agent number given.
1/27/05	17	Asked agent to repeat email address because agent read it too fast. Agent wouldn't respond until finally saying, "Is that a GA?" Agent was rude and acted ignorant about it. When asked for agent number, agent gave different number than announced at beginning of call. Apologized for inconvenience. Customer would like follow up by letter at address listed.	1/28/05	There is no agent #1471 at the Call Center as given by customer.

3/24/05	29	Voice caller dialing 711 complains her TTY user, and she never gets Caller ID and it worked before. Apologized for problem, suggested she try the 800# to see if that helps explaining that relay cannot guarantee Caller ID to work with all calls. Suggested she check with Local Phone company as well. Customer does want contact from Account Manager.	3/24/05	AM attempted to contact customer by leaving a message on answering machine 4 different times. No response. Closing contact.
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CapTel Complaints

June 1, 2004 - May 31, 2005

Date of Complaint	Nature of Complaint	Date Resolved	Explanation of Resolution
6/9/04	29 – Dual Tone Multi Frequency (DTMF) Tone Interference	6/10/04	Tech support adjusted DTMF interference with customer's voice mail system. Immediate resolution provided.
6/21/04	25 – Disconnect/reconnect during calls	6/21/04	During call, shared details as to potential reasons disruptions on the line can cause disconnect/reconnect occurrence. Static could be heard on the line, and then a disruption was experienced. Customer selected to call their phone company to check phone line.
9/21/04	29 – Echo sounds	9/22/04	Sent tips to customer to reduce the occurrence of echo.
9/27/04	25 – Disconnect/reconnect during calls	9/29/04	Did initial troubleshooting with customer to determine why she was experiencing disconnections. Sent letter with details on why disconnections can occur and suggestions for how to prevent them.
12/2/04	29 – DTMF Tone Interference	12/2/04	Tech support adjusted DTMF interference with customer's voice mail system. Immediate resolution provided.
12/13/04	58 – Inability for CapTel unit to reach toll free # due to network congestion	12/14/04	Explained to customer there was transmission congestion within the nationwide toll-free network. This disruption caused some calls not to be able to reach our Captioning Center. Managers confirmed the transmission difficulties.
1/14/05	25 – Disconnect/reconnect during calls	1/25/05	Mailed customer information explaining the difference between a CapTel phone and a traditional phone. Explained to customer why disconnect/reconnect might be occurring and sent letter with tips to reduce their occurrence. Confirmed that the occurrence was resolved.
2/15/05	58 – Inability for CapTel unit to reach toll free # due to toll free network routing problem.	2/16/05	Contacted toll free network managers who resolved the problem at their end. Customer service representative confirmed with customer that he was able to make calls.
3/17/05	24 – Incoming connection – captioned calls	3/17/05	Assisted customer in confirming her incoming 2 line access was not working due to her second line not functioning and not hooked up to CapTel successfully.

4/8/05	25 – Disconnect/reconnect during calls	4/8/05	Sent customer information explaining the difference between a CapTel and a traditional phone. Also explained reasons for disconnect/reconnect and sent email with tips to reduce their occurrence.
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Attachment #1 (continued)
Relay Utah – Summary of Complaints
June 1, 2004 – May 31, 2005

VRS Complaints

Sorenson Communications categorizes each of the VRS complaints in the following manner:

Number	Category
1	Hold times
2	Did not follow callers request
3	VI Signing/Fingerspelling was not clear
4	VI Disconnected caller
5	Affect/Intent not described
6	VI was rude
7	VI Dress inappropriate
8	Didn't keep caller informed
9	Poor voice tone/quality
10	VCO procedures not followed
11	Background noise not conveyed
12	Visible and audible noise in center
13	VI receptive skills inadequate
14	Other service type
20	Fast VRS
18	Compliment

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
6/1/04	14	Caller wants to use her children as her interpreters on the phone. Her children are interpreters at SVRS.	1/12/05	Unreachable
7/6/04	1	Wants VRS open 24/7	10/1/04	VRS now available 24/7
7/15/04	10	VI 111 did not mute sounds for VCO calls	7/22/04	Director gave additional training about muting VCO calls.

8/31/04	1	Wait too long for interpreter.	8/31/04	Interpreter apologized about long wait time.
9/14/04	14	Couldn't reschedule call	1/5/05	Forwarded to technical support.
9/20/04	20	Fast VRS not friendly for hearing	9/21/04	Acknowledged suggestion.
10/4/04	1	Call cancelled because too long hold time.	10/4/04	Interpreter apologized about long wait time.
2/7/05	13	Receptive skills of VI 647 was not good. Had problems understanding the customer, and the customer had to repeat herself often. VI 647's interpreting skills sloppy.	2/25/05	VI 647 currently is going through retraining to improve performance.
2/11/05	8	VI 1515 did not interpret all of the options, did not seem to interpret at the same time but would listen then sign.		VI 1515 will continue to improve interpreting to include all phone tree options.
5/18/05	2	VI interrupted phone conversation with Sorenson VRS introduction forcing customer to repeat conversation all over again.	5/26/05	Interpreter met with supervisor to address call handling.

Attachment #2
Relay Utah – Summary of Complaints
June 1, 2004 – May 31, 2005

For the period of June 1, 2004 through May 31, 2005, Sprint processed more than 345,902 TRS and CapTel outbound calls on behalf of Relay Utah, receiving a total of 15 (fifteen) customer complaints which amounts to about 0.00435%. All fifteen complaints were filed with supervisors at one of the TRS centers. Sorenson Communications processed 79,683 VRS calls during the same time period, originating or terminating in the State of Utah. Sorenson reports receiving 10 (ten) total customer complaints, representing approximately 0.0126% of the total VRS calls. All of these complaints were resolved in a timely fashion. None of the 25 complaints were escalated for action by the State of Utah or by the Federal Communications Commission.

Attachment #3

Relay Utah - Annual Tally Report June 1, 2004 - May 31, 2005

TRS Customer Complaints

Category # Complaint	Type of Complaint	Number of Complaints
9	Everything relayed	1
17	Agent was rude	1
21	Other problem type complaint	2
29	Other technical type complaint	1

Total = 5 complaints

CapTel Customer Complaints

Category # Complaint	Type of Complaint	Number of Complaints
24	Trouble linking up	1
25	Line disconnected	4
29	Other technical type complaint	3
58	Regional 800 calls	2

Total = 10 complaints

VRS Customer Complaints

Category # Complaint	Type of Complaint	Number of complaints
1	Hold times	3
2	Did not follow callers request	1
8	Did not keep caller informed	1
10	VCO procedures not followed	1
13	VI receptive skills inadequate	1
14	Other service type	2
20	Fast VRS	1

Total = 10 complaints

June 28, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the original and four (4) copies of the State of Utah's TRS Complaints Log. Included are the original and four (4) copies of the Consumer Complaints Log that summarizes reports from Sprint, the state's TRS provider, and from Sorenson, a VRS provider. A diskette containing the aforementioned documents has been included as well. In response to the Public Notice (DA-06-1175) dated from May 31, 2006, an electronic copy of the Log Summaries from the State of Utah is being sent to Pam Gregory with the Consumer & Governmental Affairs Bureau.

For the period of June 1, 2005 through May 31, 2006, Sprint processed 269,798 outbound TRS calls. For those calls, Sprint received 7 (seven) customer complaints for TRS and 3 (three) complaints for CapTel that totals 10 (ten) customer complaints filed with supervisors at one of the Sprint TRS Centers. Ten complaints for 269,798 calls represent approximately 0.000037% of all calls. Sorenson VRS processed 208,645 calls from June 1, 2005 to May 31, 2006 and received 9 (nine) customer complaints which represents about 0.000043% of all video relay service calls. Zero (0) complaints were received for services such as IP Relay, Speech-to-Speech Relay, and Spanish Relay. Any complaints received by the Commission Secretary or the TRS Specialist with the Utah Public Service Commission were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and as far as the Commission is aware, none of the complaints escalated into action for the FCC.

The Utah Public Service Commission was able to secure a full time Sprint Account Manager working in Utah which is different from the previous TRS contract. The Account Manager is working closely with the Commission and cooperatively held Town Hall Meetings in a variety of cities across the state in order to explain TRS products, solicit feedback about TRS, as well as explain the complaint process. A representative of Sorenson attended as well.

Recently the Utah Public Service Commission issued a survey about Captioned Telephone Service (CapTel) to current users of the equipment and service. As of this time, 60 of 135 surveys have been returned and seem to keep coming in the mail. The Commission is pleased to see such response to the survey in order to better help and serve those CapTel consumers. Satisfaction with the CapTel is at 80%, but that number could change as more are returned. It has been extremely helpful for the Commission to see where more education and training will be useful.

The Commission is also working on revamping the websites for Relay Utah. One of the necessary changes is to add a complaint form onto three different websites: www.relayutah.gov, www.connectutah.com, and www.psc.state.ut.us. This will allow consumers to gather information as well as giving the Commission another means to collect commendations and complaints about TRS, VRS, CapTel, IP Relay, etc.

The Utah Public Service Commission continues to work in conjunction with the FCC as well as strives to be proactive to providing the best possible relay service for the residents of Utah.

Sincerely,

Julie Orchard
Commission Secretary
TRS Administrator
(801) 530-6713
(801) 530-6796
jorchard@utah.gov

Attachment #1: Complaint Log Summary for Period of June 1, 2005 – May 31, 2006

Attachment #2: Summary of Complaints for Period of June 1, 2005 – May 31, 2006

Attachment #3: Annual Tally Report for Period of June 1, 2005 – May 31, 2006

Attachment #1

Relay Utah - Complaint Log Summary

Sprint categorizes each of the complaints in the following manner:

Number	Category
00	Answer Wait Time
01	Dial Out Time
02	Didn't Follow Database Instructions
03	Didn't Follow Customer Instructions
04	Didn't Keep Customer Informed
05	Agent Disconnected Caller
06	Poor Spelling
07	Typing Speed/Accuracy
08	Poor Voice Tone
09	Everything Relayed
10	HCO Procedures Not Followed
11	VCO Procedures Not Followed
12	Two-line Procedures Not Followed
13	Background Noise Not Typed
14	Feelings Not Described
15	Recording Feature Not Used
16	Noise in Center
17	Agent Was Rude
18	Problem Answering Machine
19	Spanish Service
20	Speech to Speech
21	Other Problem Type Complaint
22	Lost Branding
23	Charged for Local Call
24	Trouble Linking Up
25	Line Disconnected
26	Garbled Message
27	Database Not Available
28	Split Screen
29	Other Technical Type Complaint
30	Rates
31	OSD
32	No 900 Number
33	Carrier of Choice
34	Network Recording
35	Other
57	Caller ID
58	Regional 800 Calls
59	Transmission

Attachment #1 (continued)
Relay Utah – Complaint Log Summary
June 1, 2005 – May 31, 2006

TRS Complaints

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
6/1/05	26	UT Voice user complains of garbling when speaking to a VCO user. Apologized for the problem, referred her to the equipment program to have the device checked. Entered TT 2589605. Customer does want contact with resolution. Resubmit to add customer contact information.	6/6/05	Tech was able to reach customer by telephone on 06/06/05. Customer stated that her son went over and made some adjustments to the TTY/VCO equipment and labeled things better, and that things appear to be working now. Tech encouraged her to contact customer service again if they had more problems.
6/8/05	05	Just finished a phone call to Qwest phone company and requested to place another call. Operator responded "If you're not going to respond you will be disconnected." Customer repeated by saying "I need your help w/another call." Agent said "disconnecting due to no response. Apologized to customer explained complaint would be documented.	6/11/05	Met with CA and discussed proper procedures, however, CA believes that he was not able to hear caller and after 2 minutes, with no response, the call was disconnected.
6/29/05	17	This agent seemed rude. I was called by my friend and after the SKSK was given, the agent whispered, "I finally got rid of this customer." Apologized to the customer and informed them that this would be sent to the appropriate supervisor. No follow-up requested.	7/13/05	CA was coached to be much more polite and not make comments like that at all.
12/9/05	57	UT Voice user called to say that when he calls his girlfriend his number is now showing up on her caller ID. When he calls her with out Relay his number shows up. He said he has to call her with out Relay and then call her again with Relay so she will pick up the phone. Customer Service apologized to the customer. TT 851034 Both Voice and TTY customer would like follow up from the AM.	12/9/05	Customer record was set to "N" for caller ID send, changed to "Y" and made test calls and caller ID is sending.
12/21/05	21	711 no longer works -- transferred to customer service (actually, gave phone # to customer service so she could call herself.)	12/21/05	Transferred to customer service -- requested no follow up.

1/8/06	29	Customer called to have cell phone branded as voice and when customer service tried to brand it, the system said it could not be branded because "it is a public or restricted phone number," even though it had the info digits for a cell phone following the number. Apologized.	1/8/06	Apologized for not being able to brand cell phone.
1/30/06	21	Customer Complaint: Customer contacted Account Manager through email to report that 711 was not working from her new residential number. Account manager requested trouble ticket be entered and complaint filed. Customer Service Response: Entered trouble ticket number 1089957. Notified Account manager. Follow up requested.	1/30/06	After several calls to Qwest, customer stated that 711 is now working. She's able to place 711 calls from her home.

CapTel Complaints

Date of Complaint	Nature of Complaint	Date Resolved	Explanation of Resolution
6/29/05	Captions - dropped characters/garbled text	6/29/05	Isolated technical difficulty identified at the CA workstation. Apologized for this incident.
9/3/05	Accuracy of captions	9/8/05	Explained to customer how CapTel service generates captioning and how she may document and report problematic captioning back to our Call Center for quality control.
9/14/05	Sound Quality - Static	9/14/05	Sent customer information with suggestions for diagnosing source of static and provided customer with software update.

Attachment #1 (continued)
Relay Utah – Summary of Complaints
June 1, 2005 – May 31, 2006

VRS Complaints

Sorenson Communications categorizes each of the VRS complaints in the following manner:

Number	Category
1	Hold times
2	Did not follow callers request
3	VI Signing/Fingerspelling was not clear
4	VI Disconnected caller
5	Affect/Intent not described
6	VI was rude
7	VI Dress inappropriate
8	Didn't keep caller informed
9	Poor voice tone/quality
10	VCO procedures not followed
11	Background noise not conveyed
12	Visible and audible noise in center
13	VI receptive skills inadequate
14	Other service type
20	Fast VRS
18	Compliment

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
9/11/05	2	Does not follow my instruction to press 0 even if the answering machine recorded stated that its close	1/6/06	Manager: interpreter retrained
10/4/05	2	Interpreter was distracted with her computer for the first minute of the VRS call then just interrupted my call and switched interpreters only 2 minutes into the call.	1/3/06	Manager: interpreter retrained
1/4/06	6	She did not appropriately introduce herself with the Sorenson greeting at the start of my session, only asking "who are you calling?" and also did not appear enthusiastic in taking the call. She also closed our session in the same uninterested manner, only asking "Another call?" without the proper "Thank you for using.." closing.	5/30/06	Manager: interpreter retrained

2/13/06	6	She wasn't very friendly and was lazy. When she called to hearing person, she not even signing ringing at all.	5/30/06	Manager: interpreter retrained
3/6/06	3	Complaint about VRS Operator: I just made a VRS call about 11:00 am and Interpreter handled my call to store. I hope that I will never get her again because she is not an interpreter but a signer. She would wait until I stopped signing, sign what I said to be sure she understood me, then speak to the business. This call was much longer than it should be.	4/3/06	Manager: interpreter retrained
3/6/06	6	She needs to improve her overall demeanor, was not friendly enough and did not close the session with the usual "Thank you for using SVRS" nor a smile. She looked away immediately to her PC screen and disconnected after I declined another call.	4/3/06	Manager: interpreter retrained
4/10/06	3	Handled my call to T-mobile. She is not skilled at reading fingerspelled numbers. For example, when I signed 7, she would say 8. When I signed 6, she would say 9. Needless to say, this stretched out the length of my call to T-mobile for tech support.	5/30/06	Manager: I met with Interpreter AG7221 to discuss this customer's concern. Although the interpreter did not recall this particular call, we discussed possible factors that might have contributed to a poor interpretation in this situation. The interpreter does have difficulty at times interpreting numbers on the TV screen, so she will be assigned to participate in a peer mentoring program to improve her receptive skills in this area. We offered our apologies for the difficulty this caller experienced with our service.
5/18/06	8	Left a message on my voice mail from a Sorenson user (Deaf user called my voice mail.) I noticed the interpreter ended the message as, "Message is left from interpreter number 8679." Suggestion to have interpreter state "Sorenson VRS interpreter #" as to denote it is Sorenson VRS interpreter. "Interpreter" is vague, can be any company.	5/18/06	Manager: Leaving Interpreter ID at end of message. This is a training issue, so I have retrained all interpreters to include the Sorenson branding when leaving messages.
5/30/06	7	She was using a black shirt that revealed partial cleavage which I felt is too much to reveal.	6/1/06	Manager: interpreter will change clothing.

Attachment #2
Relay Utah – Summary of Complaints
June 1, 2005 – May 31, 2006

For the period of June 1, 2005 through May 31, 2006, there were a total of 19 complaints filed with Sprint and Sorenson for TRS, VRS, and CapTel. No complaints were filed for any of the other services e.g. Speech-to-Speech, IPRelay, Spanish Relay, etc. Sprint processed 269,798 TRS calls on behalf of Relay Utah, receiving a total of 10 (ten) customer complaints which comes to about 0.000037%. All ten complaints were filed with supervisors at one of the Sprint TRS centers. Sorenson Communications processed 208,645 VRS calls during the same time period, originating or terminating in the State of Utah. Sorenson reports receiving 9 (nine) total customer complaints, representing approximately 0.000043% of the total VRS calls. Zero (0) complaints were filed for IP Relay with Sorenson or Sprint. There were also zero (0) complaints for Spanish Relay and Speech-to-Speech Relay with Sprint. All of the 19 (nineteen) complaints were resolved in a timely fashion, and none of these 19 complaints were escalated for action by the State of Utah or by the Federal Communications Commission.

Attachment #3

Relay Utah - Annual Tally Report June 1, 2005 - May 31, 2006

TRS Customer Complaints

Category # Complaint	Type of Complaint	Number of Complaints
5	Agent disconnected caller	1
17	Agent was rude	1
21	Other problem type complaint	2
26	Garbled message	1
29	Other technical type complaint	1
57	Caller ID	1

Total = 7 complaints

CapTel Customer Complaints

Category # Complaint	Type of Complaint	Number of Complaints
21	Other problem type complaint	1
26	Garbled message	2

Total = 3 complaints

VRS Customer Complaints

Category # Complaint	Type of Complaint	Number of complaints
2	Did not follow callers request	2
3	VI signing/fingerspelling was not clear	2
6	VI was rude	3
7	VI dress inappropriate	1
8	Didn't keep caller informed	1

Total = 9 complaints

Attachment #3 (continued)
Relay Utah - Annual Tally Report by Month
June 1, 2005 - May 31, 2006

TRS Tally	Number of Complaints
June 2005	2
July 2005	1
August 2005	0
September 2005	0
October 2005	0
November 2005	0
December 2005	2
January 2006	2
February 2006	0
March 2006	0
April 2006	0
May 2006	0
Total TRS Complaints	7

CapTel Tally	Number of Complaints
June 2005	1
July 2005	0
August 2005	0
September 2005	2
October 2005	0
November 2005	0
December 2005	0
January 2006	0
February 2006	0
March 2006	0
April 2006	0
May 2006	0
Total CapTel Complaints	3

Attachment #3 (continued)
Relay Utah - Annual Tally Report
June 1, 2005 - May 31, 2006

VRS Tally	Number of Complaints
June 2005	0
July 2005	0
August 2005	0
September 2005	1
October 2005	1
November 2005	0
December 2005	0
January 2006	1
February 2006	1
March 2006	2
April 2006	1
May 2006	2
Total VRS Complaints	9

June 28, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the original and four (4) copies of the State of Utah's TRS Complaints Log. Included are the original and four (4) copies of the Consumer Complaints Log that summarizes reports from Sprint, Utah's TRS provider, as well as from Sorenson, a Video Relay Service provider. A diskette containing the aforementioned documents has been included as well. In response to the Public Notice (DA-07-2762) dated from June 22, 2007, an electronic copy of the Log Summaries from the State of Utah is being sent to Pam Gregory with the Consumer & Governmental Affairs Bureau.

For the period of June 1, 2006 through May 31, 2007, Sprint received 5 (five) customer complaints for TRS and 6 (six) complaints for CapTel that totals 11 (eleven) customer complaints filed with supervisors at one of the Sprint TRS Centers. For the same period of time, Sorenson VRS received 9 (nine) customer complaints. Zero (0) complaints were received for services such as IP Relay, Speech-to-Speech Relay, and Spanish Relay. Any complaints received by the Commission Secretary or the TRS Specialist with the Utah Public Service Commission were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and as far as the Commission is aware, none of the aforementioned complaints escalated into action for the FCC.

The Utah Public Service Commission is currently working with a full-time Sprint Account Manager located and working in Utah which has proved beneficial. The Account Manager is working closely with the Commission in implementation of a new wireless device program in

order to expand usage of IP Wireless Relay Services. Sprint and Sorenson Communications assisted the Public Service Commission in hosting 2 Open Houses in October and November of 2006 in two different areas of the state to explain TRS and VRS products as well as solicit feedback about these products and advancements. The complaint process and customer database profiles were explained.

The Commission has renewed its contract with an advertising and public relations firm in order to assist with all outreach efforts. Some goals are to update the website by making it more user-friendly as well as developing a newsletter. This firm will continue to assist with endeavors such as public service announcements regarding equipment and services such as the Captioned Telephone and wireless devices.

The Utah Public Service Commission continues to work in conjunction with the FCC as well as strives to be proactive to providing the best possible relay service for the residents of Utah.

Sincerely,

/s/ Julie Orchard
Commission Secretary
TRS Administrator
160 East 300 South
Salt Lake City, UT 84111
(801) 530-6713 (V)

(801) 530-6796 (fax)

jorchard@utah.gov

Attachment #1: Complaint Log Summary for Period of June 1, 2006 – May 31, 2007

Attachment #2: Summary of Complaints for Period of June 1, 2006 – May 31, 2007

Attachment #3: Annual Tally Report for Period of June 1, 2006 – May 31, 2007

Attachment #1

Relay Utah - Complaint Log Summary

Sprint categorizes each of the complaints in the following manner:

Number	Category
00	Answer Wait Time
01	Dial Out Time
02	Didn't Follow Database Instructions
03	Didn't Follow Customer Instructions
04	Didn't Keep Customer Informed
05	Agent Disconnected Caller
06	Poor Spelling
07	Typing Speed/Accuracy
08	Poor Voice Tone
09	Everything Relayed
10	HCO Procedures Not Followed
11	VCO Procedures Not Followed
12	Two-line Procedures Not Followed
13	Background Noise Not Typed
14	Feelings Not Described
15	Recording Feature Not Used
16	Noise in Center
17	Agent Was Rude
18	Problem Answering Machine
19	Spanish Service
20	Speech to Speech
21	Other Problem Type Complaint
22	Lost Branding
23	Charged for Local Call
24	Trouble Linking Up
25	Line Disconnected
26	Garbled Message
27	Database Not Available
28	Split Screen
29	Other Technical Type Complaint
30	Rates
31	OSD
32	No 900 Number
33	Carrier of Choice
34	Network Recording
35	Other
57	Caller ID
58	Regional 800 Calls
59	Transmission

Attachment #1 (continued)
Relay Utah – Complaint Log Summary
June 1, 2006 – May 31, 2007

TRS Complaints

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
8/13/06	24	Voice Customer reported difficulty in communicating with her relative who uses VCO with relay due to garbled text.	8/14/06	Apologized to the customer and discussed equipment. Service center ticket was issued. No follow-up. Tech consulted with the customer and a message was left encouraging the customer to call if the problem continued to occur.
10/25/06	24	Voice customer could not reach his son when he called through the relay service. He got a recorded message saying the call could not be completed due to no records of an account set up with Sprint. The customer had Comcast listed as his long-distance carrier.	3/22/07	Apologized to the customer and assured the customer that the complaint would be investigated further. The customer requested a call back. Trouble Ticket was issued. Situation was resolved.
3/5/07	29	Service: General	3/5/07	Technical problem was identified, and resolution was provided by network provider.
3/5/07	29	Service: General	3/5/07	Technical problem was identified, and resolution was provided by network provider.
3/15/07	58	Dialing issue: unable to dial regional 800 number.	3/15/07	Provided customer with equivalent regional number.

CapTel Complaints

Date of Complaint	Nature of Complaint	Date Resolved	Explanation of Resolution
6/2/06	Connection issue: the connection got disconnected and reconnected during calls.	7/6/06	Apologized to the customer and sent customer information explaining the difference between a CapTel phone and a traditional phone, and explained to the customer why problems with connection might occur. Sent email with tips on reducing problems with connection.
6/23/06	Captioning issue: Dropped characters and garbled text. Characters were missing and there were line quality problems.	6/23/06	Explained to the customer how the CapTel works and how the quality of the phone line affects the quality of the captions. Gave the customer information on how to contact the phone company and have them check the quality of the phone line.
1/12/07	Service: General	1/12/07	The technical problem with the inbound call was reported at 8:15 am CST on 1/12/07, and it resulted in increased queue waiting time. The problem was completely resolved at 10:28 am CST by CapTel Technical Support.

1/12/07	Service: General	1/12/07	The technical problem with the inbound call was reported at 8:15 am CST on 1/12/07, and it resulted in increased queue waiting time. The problem was completely resolved at 10:28 am CST by CapTel Technical Support.
2/1/07	Accuracy of Captions	2/1/07	The customer shared feedback regarding accuracy of captions. The CS Rep. apologized for the incident and thanked the customer for providing feedback. The customer was advised to document the date, time, and CA number for more specific follow-up.
2/13/07	Disconnect/Reconnect during calls	2/14/07	Sent customer information explaining the difference between a CapTel phone and a traditional phone and explained to the customer why problems with connection might occur. Sent email with tips on reducing problems with connection.

Attachment #1 (continued)
Relay Utah – Summary of Complaints
June 1, 2006 – May 31, 2007

VRS Complaints

Sorenson Communications categorizes each of the VRS complaints in the following manner:

Number	Category
1	Hold times
2	Did not follow callers request
3	VI Signing/Fingerspelling was not clear
4	VI Disconnected caller
5	Affect/Intent not described
6	VI was rude
7	VI Dress inappropriate
8	Didn't keep caller informed
9	Poor voice tone/quality
10	VCO procedures not followed
11	Background noise not conveyed
12	Visible and audible noise in center
13	VI receptive skills inadequate
14	Other service type
20	Fast VRS
18	Compliment

Date of Complaint	Category #	Nature of Complaint	Date Resolved	Explanation of Resolution
6/5/06	1	Long hold time.	6/5/06	Customer Service: Apologized for the long hold time.
9/7/06	3	VI signing was not clear.	9/11/06	Manager: interpreter retrained
9/12/06	3	VI signing/fingerspelling was not clear.	9/12/06	Manager: interpreter retrained
12/4/06	3	VI signing/fingerspelling was not clear. No ID# was given.	12/4/06	No interpreter number was provided with the complaint so no retraining could be completed.
12/13/06	13	VI receptive skills inadequate.	12/13/06	Manager: interpreter retrained.
2/28/07	13	VI receptive skills inadequate.	3/19/07	Manager: interpreter retrained.
4/11/07	3	VI signing/fingerspelling was not clear.	4/23/07	Manager: interpreter retrained.
4/23/07	13	VI receptive skills inadequate/	5/1/07	Manager: interpreter retrained.
4/27/07	3	VI signing/fingerspelling was not clear.	5/9/07	Manager: interpreter retrained.

Attachment #2
Relay Utah – Summary of Complaints
June 1, 2006 – May 31, 2007

For the period of June 1, 2006 through May 31, 2007, there were a total of 20 complaints filed with Sprint and Sorenson for TRS, VRS, and CapTel. No complaints were filed for any of the other services e.g. Speech-to-Speech, IPRelay, Spanish Relay, etc. Sprint received a total of 11 (eleven) customer complaints and all complaints were filed with supervisors at one of the Sprint TRS or Captioning centers. Sorenson Communications reports receiving a total of 9 (nine) complaints in the period of June 1, 2006 through May 31, 2007 of all calls originating or terminating in the State of Utah. All 20 (twenty) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

Attachment #3

Relay Utah - Annual Tally Report June 1, 2006 - May 31, 2007

TRS Customer Complaints

Category # Complaint	Type of Complaint	Number of Complaints
24	Trouble Linking Up	2
29	Other Technical Type Complaint	2
58	Regional 800 Calls	1

Total = 5 complaints

CapTel Customer Complaints

Type of Complaint	Number of Complaints
Connection	2
General Service	2
Captioning - accuracy	2

Total = 6 complaints

VRS Customer Complaints

Category # Complaint	Type of Complaint	Number of complaints
2	Did not follow callers request	2
3	VI signing/fingerspelling was not clear	2
6	VI was rude	3
7	VI dress inappropriate	1
8	Didn't keep caller informed	1

Total = 9 complaints

Attachment #3 (continued)
Relay Utah - Annual Tally Report by Month
June 1, 2006 - May 31, 2007

TRS Tally	Number of Complaints
June 2006	0
July 2006	0
August 2006	1
September 2006	0
October 2006	1
November 2006	0
December 2006	0
January 2007	0
February 2007	0
March 2007	3
April 2007	0
May 2007	0
Total TRS Complaints	5

CapTel Tally	Number of Complaints
June 2006	2
July 2006	0
August 2006	0
September 2006	0
October 2006	0
November 2006	0
December 2006	0
January 2007	2
February 2007	2
March 2007	0
April 2007	0
May 2007	0
Total CapTel Complaints	6

Attachment #3 (continued)
Relay Utah - Annual Tally Report
June 1, 2006 - May 31, 2007

VRS Tally	Number of Complaints
June 2006	1
July 2006	0
August 2006	0
September 2006	2
October 2006	0
November 2006	0
December 2006	2
January 2007	0
February 2007	1
March 2007	0
April 2007	3
May 2007	0
Total VRS Complaints	9

REQUEST FOR PROPOSAL (RFP)

For the provision of the

TELECOMMUNICATIONS RELAY SERVICE,

Relay Utah

RFP # DG 4016

Issued by the

PUBLIC SERVICE COMMISSION

DEBBIE GUNDERSEN, PURCHASING AGENT

Proposal Due Date

July 27, 2004

For further information:

Julie Orchard, Public Service Commission - (801) 530-6716 (V)
Allison Flanders, Public Service Commission - (801) 530-6769 (V/TTY)

State of Utah

Olene S. Walker, Governor
Department of Administrative Services
Camille Anthony, Executive Director

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1. GENERAL INFORMATION

1.1 Introduction and Background

The purpose of this document is to provide interested parties with information to enable them to prepare and submit a proposal for providing a statewide telecommunications relay service (TRS) for the State of Utah, known as Relay Utah. TRS provides a telecommunications platform in order that text telephone (TTY) users and non-TTY users can communicate with each other via the public switched telecommunications network. This service requires state-of-the-art technology, the use of highly trained and skilled Communications Assistants (CA's), and is available 24 hours per day, seven days per week, 365 days per year. The prevailing standard of the TRS is to provide people with disabilities access to telecommunications services in a manner functionally equivalent to voice to voice conversations.

The State, as represented by the Department of Administrative Services, will use the results of this RFP process to award a three (3) year contract, with an option by mutual agreement of the agency and contractor, to renew for two (2) additional one-year periods. A maximum of five (5) years may be contracted with the awarded vendor as the result of this RFP. The State wishes to contract with a single vendor for the provision of TRS. Proposals must be presented by a singular administrative entity which will assume responsibility for the financial, technical and human resource elements needed to provide the quality of service required by this RFP and ensuing contract. This is not to preclude subcontracting relationships. For example, the Offeror may consider contracting with a local consumer organization that serves people with communication disabilities for operation and maintenance of the Telecommunications Relay Service. *An in-state relay service center is not required from the awarded vendor. A full-time account manager is also not required or necessary.*

The Public Service Commission strives to provide the best possible TRS service for Utahns. The Commission is interested in providing innovative technology and/or new services that exceed those that are required by the FCC and this RFP. Therefore, the Commission requests that Offerors keep this in mind while compiling their proposals. States are currently not required to provide Video Relay Services (VRS), Captioned Telephone Voice Carry-Over Service, and Internet Protocol Relay, however, the Commission requests information and cost estimates of providing these services along with any and all other potential technologies and services.

1.2 Procuring and Contracting Agency

This RFP is issued by the State of Utah, Division of Purchasing for the Department of Administrative Services, which is the sole point of contact for the State during the selection process. The person responsible for managing the procurement process is Debbie Gundersen.

The Utah Public Service Commission will administer the contract resulting from this RFP. The contract administrator is Julie Orchard.

1.3 Definitions

7-1-1: The abbreviated dialing code for accessing all types of relay services anywhere in the United States.

Abandoned Call: An abandoned call is an incoming call reaching the relay system but not answered by a CA.

ADA: The Americans with Disabilities Act.

Agency: The Utah Department of Administrative Services.

AMR (Answering Machine Retrieval): AMR is a feature that allows callers to retrieve their answer machine messages through the CA.

ANI (Automated Number Identification): ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.

ASA (Average Speed of Answer): ASA measures the time it takes the call to reach the CA position from the relay center call controller switch.

ASCII (America Standard Code for Information Interchange): An eight bit code that can operate at any standard transmission Baudot rate including 300, 1200, 2,400 and higher.

ASL (American Sign Language): A visual language based on hand shape, position, movement, and orientation of the hands in relation to each other and to the body.

Baudot: A 7-bit code, only 5 of which are info bits. Baudot is used by some text telephones to communicate with each other at a 45.5 baud rate.

Billable Minutes (Session Minutes Basis): For the purpose of calculating and rendering bills for relay service to the State, billable minutes is the time elapsed between the incoming call being answered by the CA at the TRS facility through the time the call is terminated by the CA. Time for each session shall be recorded to the nearest tenth of a minute; all session times for the calendar month shall be

added and rounded to the nearest minute, and this total shall be the amount of time billed to the State.

Blocked Call: Any call that arrived at the Contractor's switch but was not answered due to a continuous ring, and/or in queue (or any other form of holding a call that has reached the Contractor's network) for more than 90 seconds, while waiting for a relay operator to be connected to the call and begin to interact with the calling party.

Branding of Call Type: Branding is the ability to answer an incoming call based on the previous caller's communications mode (i.e. ASCII, HCO, Spanish, VCO, Voice or TTY). A TRS user may also set up a permanent brand in his customer profile with Customer Service.

Call Release: A TRS feature that allows the CA to sign-off or be "released" from the telephone line after the CA has set-up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the TTY party can only be reached through a voice-only interface, such as a switchboard.

Caller ID: When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 7-1-1, or the number of the calling party. True Caller ID is defined as the identification of the calling party's telephone number.

CDR: Call Detail Record.

Call Set-Up: It is an outgoing call as a starting point that is automatically documented in the CDR computer from the called party to the calling party.

Call Wrap Up: An outgoing call that is being "hung up" by either party.

Call Duration: An outgoing call, which has recorded the actual length of time between the set-up and the call wrap-up.

Captioned Telephone VCO Service/Enhanced VCO Services with Voice Recognition: This service uses a telephone with a text display that allows the user to listen to the other party's speech and simultaneously read captions of what the other party is saying. The device may have amplification built into the captioned telephone. A typical user of the service has the ability to speak and has residual hearing in order to listen to what is said while also reading the captions for clarification. The CA uses specially developed voice recognition technology to generate the captions.

Commission: The Public Service Commission.

Communication Assistant (CA): A person who transliterates conversation from text to voice and from voice to text between two end users of TRS.

Completed Outgoing Call: A completed outgoing call is one that is answered by the called party. This includes calls answered by any person at the called party's number as well as calls answered by an answering machine, voice mail, or forwarded to another telephone number.

Customer Database: A database that allows callers to enter specific information into a profile in order to expedite the call set-up time. Information often includes the caller's name and address, long distance profile, frequently dialed numbers, out-dial message for identification purposes, call block, out-dial restrictions, emergency numbers, and other customer notes.

Disconnected Call: An outgoing call in which the calling party or the CA terminates the incoming call before the called party answered.

FCC: Federal Communications Commission.

FCC Rules: The rules governing the creation and certification of TRS issued in July 1991 as part of the Americans with Disabilities Act, Title IV.

General Assistance Calls: The category of incoming calls not associated with an outgoing call attempt. Even though an incoming call may reach the relay center, no associated outgoing call attempt may be made because such reasons as, but not limited to: either the CA or the calling party cannot hear or read the other because of technical problems, the calling party may only be seeking information from the CA about relay or some other topic, calling party may have misdialed and have not intended to call TRS at all, calling party may have forgotten the number of the party he/she wishes to reach, etc.

Grade of Service: A term indicating the probability that a call attempted will receive a busy signal. A P.01 Grade of Service means that user has a one percent chance of reaching a busy signal.

Hearing Carryover (HCO): HCO is a form of TRS where the person with the speech disability is able to listen to the other end user and, in reply, the CA speaks the text as typed by the person with the speech disability. The CA does not type any conversation. Two-line HCO is an HCO service that allows TRS users to use one telephone line for hearing and the other for sending TTY messages. HCO-to-TTY allows a relay conversation to take place between an HCO user and a TTY user. HCO-to-HCO allows a relay conversation to take place between two HCO users.

Incoming Call: An incoming call refers to the portion of the communications connection from the calling party reaching the relay service center. An incoming call can be a general assistance call, or it can be an incoming call associated with an outgoing call, or it can be a call that is abandoned before being answered by the

CA. An incoming TTY call is a call originated by a TTY user. An incoming telephone call is a call originated by a telephone user.

Incomplete Outgoing Call: An outgoing call that is not answered by the called party. This includes calls, which ring with no answer, and calls that receive a line busy or trunk busy response.

Interpret: To change the text of a TTY user or the speech of a voice user into a language readily understood by the appropriate party without reciting or typing word for word.

KBS: Kilobits per second

LATA: Local Access Transport Area.

NPA: Number plan area, i.e., area code.

NXX: Prefix-line number.

Outgoing Call: An outgoing call refers to the portion of the communications connection from the TRS facility to the called party. An outgoing call may (completed) or may not (incomplete) be answered by the called party.

Offeror: A company or organization submitting a proposal in response to this RFP.

PSE (Pidgin Signed English): PSE is a mix of ASL rules and English grammar and finds itself somewhere between ASL and Signed Exact English.

Public Safety Answering Point (PSAP): A facility that has been designated to receive 911 calls and route them to emergency services personnel.

RFP: Request for Proposal.

Session Minutes: The time during which the CA is connected to the call originator or terminating party including call set up and wrap up time.

Speech to Speech Relay Service: A telecommunications relay service that allows persons with speech disabilities to communicate with voice telephone users through the use of specially trained CA's who understand the speech patterns of persons with speech disabilities and can repeat the words spoken by that person.

Spanish Relay Service: A telecommunications relay service that allows persons with hearing or speech disabilities who use Spanish to communicate with voice telephone users in Spanish as well as with a CA who is fluent in the language.

Telecommunications Relay Service (TRS): Telephone transmission services that provide the ability for an individual who has a hearing or speech disability to

engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing or speech disability. This service enables two-way communication between an individual who uses a text telephone or other non-voice terminal device and an individual who does not use such devices.

Three-way calling: Three-way calling is a TRS feature that allows more than two parties to be on the telephone line at the same time with the CA.

Transliterate: To type or voice the speech or text exactly as it is presented to the Communications Assistant.

TTY (text telephone): A machine that employs graphic communication in the transmission of coded signals through a wire or radio communication system.

TTY User: Anyone with a speech or hearing disability who uses a TTY or similar device to communicate on the telephone. This would include a deaf/blind person using a TTY with Braille or a person with a speech disability using a computer with a modem.

User: Includes either the calling party or the called party in a relay call.

Video Relay Service (VRS): A telecommunications relay service that allows people with hearing or speech disabilities, who use sign language, to communicate with voice telephone users through video equipment. The video link allows the CA to view and interpret the party's signed conversation and relay the conversation back and forth with a voice caller.

Voice Carryover (VCO): VCO is a reduced form of TRS where the person with the hearing disability is able to speak directly to the other end user. The CA types back to the person with the hearing disability. The CA does not voice the conversation. Two-line VCO is a VCO service that allows TRS users to use one telephone line for voicing and the other for receiving TTY messages. VCO-to-TTY allows a relay conversation to take place between a VCO user and a TTY user. VCO-to-VCO allows a relay conversation to take place between two VCO users.

WPM: Words Per Minute.

1.4 Clarification of the Specifications and Requirements

If additional information is needed to interpret specifications or understand the RFP process, written questions will be accepted through May 21, 2004. Questions and answers will be compiled and sent to all vendors as an addendum on the RFP list. The answers will also be available on the website at www.purchasing.utah.gov.

1.5 Timetable

RFP Released April 27, 2004
Questions Due May 21, 2004

*Please send questions to Kristylynn Brady:
Public Service Commission
Heber M. Wells Bldg. 4th Floor
160 East 300 South
Salt Lake City, Utah 84111
Phone: (801) 530-6638*

Answers Mailed Out May 28, 2004
Answers to vendor questions will come as an addendum as the RFP from the Division of Purchasing and will also be posted on the Department's website at www.purchasing.utah.gov.

Proposals Due 3:00 p.m. on Tuesday, July 27, 2004
Projected Date of Award October 22, 2004
Implementation Date January 28, 2005

NOTE: These dates represent a tentative schedule of events. The State reserves the right to modify these dates at any time, with appropriate notice to prospective vendors.

1.6 Contract Term and Funding

The contract shall be effective **January 28, 2005**. The contract shall run for three (3) years from that date, with an option by mutual agreement of the agency and the contractor, to renew for two (2) additional one (1)-year periods, with a maximum of five (5) years. If for some reason the Contractor fails to meet the date of January 28, 2005, then a reasonable estimate of damages shall be \$2,500 per day.

2. PREPARING AND SUBMITTING A PROPOSAL

2.1 General Instructions

The evaluation and selection of a contractor and the contract will be based on the information submitted in the proposal plus references and any required on-site visits or oral presentations. Offerors should respond clearly and completely to all requirements.

Elaborate proposals (e.g. expensive artwork), beyond that sufficient to present a complete and responsive proposal, are not necessary or desired.

Providers wishing to secure a copy of this RFP on diskette or via e-mail may do so by contacting:

Division of Purchasing
Attn: Kelley Mills
Phone: (801) 538-3151 (V)
KLMILLS@utah.gov

2.2 Incurring Costs

The State of Utah is not liable for any cost incurred by Offerors in replying to this RFP.

2.3 Submitting the Proposal

Offerors must submit three (3) originals and eight (8) copies of the proposal and the cost proposal to the Agency. All proposals must be packaged, sealed and show the following information on the outside of the package:

Vendor's name and address
RFP title and number
Proposal due date and time

The proposal package must be delivered to:

Division of Purchasing
3150 State Office Building
Salt Lake City, Utah 84114

All proposals must be received by the Division of Purchasing no later than **3:00 p.m., Tuesday, July 27, 2004**. Contractors mailing their proposals must allow sufficient time for delivery of their proposals by the time specified. Proposals that are not received on time will be returned, unopened.

2.4 Proposal Organization and Format

Proposals should be typed and submitted on 8.5 by 11-inch paper, bound securely. Proposals must be organized into the volumes, headings and subheadings listed below. Each heading and subheading should be separated by tabs or otherwise clearly marked. The relevant RFP sections are referenced in the parentheses.

Volume I – Management & Technical Proposal
Cover Page

Introduction (1.1)
Mandatory Requirements (4.1)
System Design and Maintenance Requirements (4.2)
CA's Services Requirements (4.3)
Billing Requirements (4.4)
Education and Outreach Requirements (4.5)
References (4.6)
System Enhancement (4.7)
Transition Plan (7.1)

Volume II – Cost Proposal

Cover Page
Cost Proposal (5.2)
Required Forms (8)
Appendices (9)

2.5 Oral Presentations and Test Calls

Offerors may be required to make oral presentations to clarify and verify the written proposals. These presentations will be held subsequent to the receipt of the proposal to provide an opportunity for the respondent to clarify its proposal. The Agency will schedule a time and location for each oral presentation it requests.

Site visits will not be necessary; however, test calls to existing TRS facilities will be made on the sole discretion of the evaluation team. Test calls will follow the criteria established before the RFP was sent out as a draft and will test a variety of quality issues. The results of these test calls will be incorporated into the final scoring process.

3. PROPOSAL REQUIREMENTS

It is the State of Utah's intention to offer its citizens a state-of-the-art telecommunications relay system. As such, the following specifications must be addressed in the proposal. All specifications will be scored unless otherwise stated. The evaluation criterion is provided in RFP paragraph 6.6.

3.1 Mandatory

3.1.1 The Offeror shall construct the relay system in compliance with this RFP, Utah Public Service Commission Rules, and all existing minimum standards and regulations adopted by the FCC that are found in 47 C.F.R., Section 64.601 et. seq., including the Rule and Order released February 27, 2004 and any future standards and regulations that may be required by the FCC **after** the release of this RFP, are hereby incorporated by reference as minimum standards required in the context of this RFP, whether or not said standards are specifically mentioned, named, or referred to in this RFP. At

a minimum, Relay Utah must keep up with industry standards but strives to exceed them.

- 3.1.2 The Offeror shall supply all necessary telecommunications equipment and software. The transmission circuits shall meet or exceed FCC and PSC interexchange performance standards for circuit loss and noise.
- 3.1.3 Local, intra-LATA toll, and intra-state inter-LATA toll calls originating or terminating in Utah. Explain how these types of calls will be handled and, when necessary, explained by the CA to the caller.
- 3.1.4 Interstate and international calls. Discuss how these calls will be handled through Relay Utah.
- 3.1.5 *Relay Utah Phone Number:* The Commission intends to retain the current Voice, TTY, VCO, STS, ASCII and Spanish 800 numbers used to reach Relay Utah. A 900 number will need to be provided. In addition, relay users must be able to access the relay through dialing 711. Those current numbers are as follows:

- 1-800-346-4128 - TTY
- 1-888-735-5906 - Voice
- 1-888-346-5822 - Speech-to-Speech
- 1-800-346-7141 - Voice Carry-Over
- 1-888-346-3162 – Spanish Relay
- 1-888-735-5907 – ASCII
- 711 - Points to the Relay Utah voice number (1-800-735-5906)

The awarded vendor shall provide a 24-hour, toll-free Customer Service number.

- 3.1.6 The relay system must be designed to meet the following reliability specifications:
 - a. *Uninterruptible Power System (UPS):* The UPS can be a combination of battery backup, commercial UPS supply, and/or auxiliary generator, provided it is capable of supplying uninterrupted power. A minimum of eight (8) hours battery capacity sufficient to operate the Relay Center at busy season, busy hour load shall be maintained. In addition, the Relay Center shall have installed power-generating equipment capable of operating the center for extended periods of time. The UPS must support the switch and its peripherals, switch room environment (air conditioning if required to maintain service, fire suppression systems, emergency lights and system alarms), CA consoles/terminals, CA work site emergency lights, and Call Detail Recording (CDR).

- b. *Switching System:* The switching shall include a redundant Central Processing Unit (CPU) on “hot stand-by” to ensure that no calls are dropped due to processor failure, a full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities, on-line system monitoring, real time programming capabilities which will not take the system off line, the ability to perform preventive maintenance without taking the system off line, and an inventory of spare critical components (to be defined by the provider) which are maintained on site to ensure the required levels of service are met.
 - c. *Intercept Message:* Intercept messages as appropriate shall be provided if a system failure occurs within the relay switch, relay center or on outbound circuits. Voice, Baudot, and ASCII messages shall be provided. Intercept messages on inbound circuits may or may not be under the control of the service provider. Minutes of use attributed to accessing these messages shall not be included in billable minutes.
 - d. *Disaster Recovery Plan:* The provider shall create, and submit with its proposal, a complete plan (not just an outline) for dealing with all types of natural and man-made problems. A primary requirement is to notify the Contract Administrator immediately if a major problem occurs. In addition, the plan should detail the level of escalation that will be employed to deal with the problem and restore service. The plan shall be designed to ensure that no aspect of relay service is impaired.
- 3.1.7 The TRS must be in operation 24 hours per day, seven days per week throughout the year (including holidays). It must be accessible statewide.
- 3.1.8 Users of the TRS will be allowed to make multiple calls per contact through the relay system. There will be no time limitation on any specific call.
- 3.1.9 TRS users must be able to place calls from within Utah to any point in the world and from all points outside Utah to any point within Utah. The exception to this will be calls defined as overflow. The successful Offeror shall be responsible for seeking reimbursement for the processing of interstate and international calls from the FCC appointed fund administrator, which at present, the National Exchange Carrier Association (NECA) functions in this capacity. NECA reimbursed minutes shall be reported to the State on a monthly basis for informational purposes.
- 3.1.10 The Offeror shall work with the Local Exchange Carriers to access the use of nationwide, universal 711 or 800 numbers for access to the service.

3.1.11 The system shall offer or make available standard operator services equal to those typically offered to voice telephone users. This includes directory assistance services, which must be billed in accordance with paragraph 3.2.22 and 3.4.6 of this RFP.

3.1.12 Service shall begin by January 28, 2005 with no exceptions.

3.2 System Design and Maintenance

3.2.1 *Handling of Emergency Calls:* Explain how, when relay users do not call the 911 system directly, the relay center will assist callers who want emergency assistance by automatically and immediately transferring the caller to an appropriate PSAP. An appropriate PSAP is the designated one to which a direct call from the particular number would be delivered. A CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. Detail the call routing procedures and interaction between the CA and 911 dispatcher.

3.2.2 All calls shall be held in strict confidence. Proposals must include procedures to ensure this high level of confidentiality. Proposals must also address the protection of electronically collected information as well as information obtained by the CA in the course of relaying a call.

3.2.3 The system shall be capable of receiving and transmitting in voice, Baudot and ASCII codes. It must also be capable of automatically switching to the incoming call mode: voice, Baudot or ASCII (at different settings). Proposals must include details as to how your company's system will automatically identify and switch to the correct mode of communication. The Offeror shall also describe how outbound calls to ASCII equipment will be accomplished.

Additionally, an alternate protocol for sending and receiving conversations is required. This alternate protocol must be faster than Baudot but without the limitations of ASCII. It must be able to transmit as fast as the individual can type and have the capability of interrupting a conversation in progress. Please describe a method for accomplishing this requirement and how the solution will be integrated into the TRS facility.

3.2.4 Monthly traffic reports will be generated by the Offeror to the TRS Contract Administrator on a monthly basis. The reports shall be submitted no later than the 21st of the month following that for which service was provided. Reports shall include but not be limited to the following:

Total monthly call minutes
Total monthly interstate call minutes
Total monthly international call minutes
Total interstate directory assistance minutes

Total toll-free assistance minutes

Total monthly minutes billed to the State

Total monthly invoice cost

Monthly number of inbound calls broken down by:

- Total in queue
- Total abandoned
- Total answered

Monthly average talk time for inbound calls and average talk time by six-hour increments per day

Monthly average speed of answer of inbound calls by relay center answering Relay Utah calls and broken down by six-hour increments per day

Monthly total of outbound calls

Monthly number of outbound calls is mandatory, broken down by each of the following:

- Completed
- Busy
- No answer
- Local calls
- Intrastate calls intra-LATA
- Intrastate calls inter-LATA
- Interstate calls originating inside Utah
- Interstate calls originating outside Utah
- International calls
- General assistance calls
- Directory assistance calls
- Toll-free 800/888/877 calls
- 900/976 access calls
- Voice calls in English and their percentage of monthly total calls
- Voice calls in Spanish and their percentage of total monthly calls
- TTY calls in English and their percentage of monthly total calls
- TTY calls in Spanish and their percentage of monthly total calls
- ASCII calls and their percentage of monthly total calls
- Hearing carryover calls to hearing carryover calls
- VCO calls and the percentage of monthly total calls
- VCO to VCO calls and their percentage of monthly total calls
- Speech to speech calls and their percentage of monthly total calls
- Spanish to Spanish calls and their percentage of monthly total calls
- Spanish to English and English to Spanish calls and their percentage of monthly total calls

Monthly average time length of outbound calls leaving the relay center is mandatory, reported by the following type of call:

- Voice
- TTY
- ASCII
- VCO
- VCO to VCO
- Speech to speech
- Spanish to Spanish
- Spanish to English/English to Spanish
- Other (please identify what else your system is able to track)

Daily NPA-NXX TTY and voice calls by originating prefix is desired

Monthly average call handling time including:

- Number of seconds for call setup and call wrap-up
- Talk time in minutes and seconds between end users

Average blockage rate by month, with supplemental reports showing total number of inbound calls per day and number of inbound calls blocked per day

Monthly average number of outbound calls by weekday and by weekend days

Complaints received by month, with a supplemental report identifying the types of complaints.

Other reports as may be required.

Changes in report format and content may be requested by the Contract Administrator. Any deviation from the report format identified in this response will be done at no additional cost to the State. Proposal must include sample reports reflecting the preceding information.

If any or all of the other desirable services are also provided by the vendor i.e. Captioned VCO Telephone Service, IP Relay, and VRS, then reports must be provided as well. See Section 3.7 for further details on reporting.

- 3.2.5 The Commission desires two (2) copies of a composite Annual Report which is to be submitted to the Contract Administrator. The time period for this report is the State's Fiscal Year of July 1- June 30. This report shall include information such as statistical summaries of usage, recent trends and analysis, promotional and outreach activities associated with Relay Utah, service changes, and any future trend projections.
- 3.2.6 The State requires the Provider to meet or exceed a grade of service of $p=.01$. This will be monitored every half-hour and reported to the Contract Administrator in accordance with the reporting requirements set forth in this RFP. Daily blockage reports will be used to determine contract compliance

and also to determine liquidated damages. This grade of service shall apply to equipment and network availability, as well as CA availability. Proposals must include network plans including diagrams of routing systems and CA staffing plans depicting this grade of service.

- 3.2.7 *Intercept Messages:* Appropriate intercept messages shall be provided if a system failure occurs. Please describe the message(s) used and how quickly the message(s) will be enabled and disabled.
- 3.2.8 The State prefers to exceed the FCC standard in order that 90 percent of all calls are answered within ten seconds. This shall be measured and monitored on a daily basis. Proposals must also include procedures on how this will be in place to ensure this level of response. Please describe how this will be monitored and reported to the Contract Administrator.
- 3.2.9 Audiotext, interactive voice response units (IVR's), and answering machines can be problematic for the TRS due to the speed at which they are recorded. The provider must describe a technological solution to capturing the verbal message so that it can be played back at speeds agreeable to the CA. A procedure for handling calls of this nature must be included in the proposal.
- 3.2.10 *Message retrieval:* Please describe how answering machine and voice mail message retrieval services will be provided.
- 3.2.11 The State wishes to be aware of technological advancements regarding the provision of relay. Upon deeming the technology to be reliable, the State may wish to have these improvements incorporated into the TRS. Please describe the following:
- How does the Offeror plan to inform the Commission of new developments or products?
 - What is the Offeror's process to determining the reliability of the technology?
 - What proprietary precautions or measures would be required?
 - How will the technology be priced?
- 3.2.12 Access to regionally restricted 800/888/877 numbers and pay-for-service numbers. The awarded vendor shall provide access to regionally restricted 800/888/877 numbers, business offices of local telephone companies that have special prefixes, and pay-per-call telephone numbers such as 900 and 976. Describe how this will be accomplished.
- 3.2.13 The TRS must have the capability of expanding CA services to meet the increase of call volume and conversely demonstrate the ability to decrease during lesser traffic periods. Describe how these peaks and valleys in service will be accommodated. Also, please describe any methodology for

predicting these surges in call volume as well as stating plans to increase trunking capacity when necessary or adding equipment. Please state the time lag anticipated to meet these unexpected increases in call volume.

- 3.2.14 The system must be as automated as possible to ensure cost effectiveness. Proposals must include details on how macros are used to facilitate CA typing during the Relay process and how they are used in measuring CA typing speed. Please detail any other programming efforts or other innovative techniques used to minimize call-handling time.
- 3.2.15 Communication among CA's and their supervisor is desirable. Describe what methodology will be deployed to enable CA's to communicate with each other, supervisors and administrators. This system should address how employees of the TRS will be notified of daily policy or system changes, special announcements or obtain information so that continuity will be achieved.
- 3.2.16 *Customer Profiles:* The Commission desires that the Offeror use customer profiles for ease in call processing. The Offeror shall incorporate software capable of storing data on TRS users who request this function. The Offeror shall describe how customer profiles will be used as well as the user preferences available.
- 3.2.17 *Call release:* Please describe how call release services will be provided.
- 3.2.18 *Speed-dialing:* Please describe how speed-dialing services will be provided.
- 3.2.19 *Caller ID:* Outline the technology and procedures used to provide Caller Identification services. Explain if True Caller ID is or is not available.
- 3.2.20 *Three-way Calling:* Please describe how three-way calling will be provided.
- 3.2.21 Vendors shall explain how they will rate and process coin-sent paid long distance calls made from pay telephones.
- 3.2.22 *Directory assistance:* The awarded vendor shall provide callers with access to local and long distance directory assistance. Local assistance must be billed to end users at the same rate that would be billed by the local company directly servicing the end user. Long distance calls must be billed at the provider's tariffed rate or at the rate of the carrier used for the long distance directory assistance call. Vendors shall briefly describe how this service will be provided and billed to end-users.
- 3.2.23 *Use of ANI:* Automatic Numbering Identification technology shall be used so that no caller is required to give his/her originating calling number,

except in instances where ANI information is not available from the local exchange company or competitive local carrier.

- 3.2.24 *Automatic error correction:* The State highly desires that providers have an error-correction function to automatically correct typographical errors made by Communications Assistants. If this system is available, please describe how it functions.
- 3.2.25 *Cellular:* Vendors shall discuss how their procedures for handling cellular and other communications and how they will be billed.
- 3.2.26 *Voice Carry-Over (VCO) and Hearing Carry-Over (HCO):* Vendors shall provide a brief description of how they provide these services in all their various forms and in compliance with FCC guidelines. Describe how VCO and HCO are explained to end-users.
- 3.2.27 *Spanish Relay:* A description shall be provided about how this service is handled and explained to end-users.
- 3.2.28 *Gender identification:* The Commission requires that the CA's identify their gender at the start of the call. If this protocol is not established, explain the process of how callers may request that a male or female CA process their calls when they reach the relay center.
- 3.2.29 Capability of CA's to handle Spanish language calls 24 hours a day, 7 days per week shall be ensured. Spanish relay services shall be available in both Spanish to Spanish and Spanish to English.
- 3.2.30 *Enhanced PROTOCOL/TURBOCODE:* The Offeror's system must use enhanced protocol software in its relay system to help speed up the process of typing and reduce interruptions of conversations.
- 3.2.31 *Carrier of Choice (COC):* The Offeror shall allow the relay user to choose his or her preferred interexchange carrier when placing toll calls through Relay Utah. The CA is not required to verbally offer the option, but must describe the option when asked by a relay user. An explanation of COC must be included in all appropriate relay publications.
- 3.2.32 *Complaint Resolution:* The Offeror must outline procedures regarding complaints, inquiries, and comments regarding Relay Utah services and personnel. The Offeror must work with the Public Service Commission in order to maintain a log of consumer complaints, including all complaints about TRS in the state, to be sent to the FCC by July 1st on an annual basis. The time period runs from June 1 to May 31st. A copy of the complaints and respective resolutions, or proposed resolutions, must be sent by the 21st of each month to:

Julie Orchard, Commission Secretary
Public Service Commission
160 East 300 South
Salt Lake City, UT 84111

At minimum, the complaint logs must include the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. Proposal must include a detailed plan addressing how the Offeror will comply with the expectations for complaint resolution as defined in this section. Proposal must also address how the Offeror will ensure that consumers who file complaints with either Customer Service or the Commission and expect to be contacted with a resolution will receive a written response from the contractor outlining the resolution to the complaint. Please provide examples.

3.3 Communications Assistant (CA) Services

3.3.1 The CA will announce all calls, unless otherwise directed by the caller, according to a predetermined script. Please describe how CA's will announce calls and provide a sample script.

3.3.2 All CA's must possess the following skills and abilities prior to handling any type of TRS calls:

Typing speed shall be at least 60 wpm. Technological aids may be used to reach this required typing speed. TRS provider must give oral-to-type tests of CA speed.

Sufficient training to meet the specialized communications needs of individuals with hearing and speech disabilities.

Competent skills related to English grammar, spelling at a minimum of the 12th grade level, interpretation of typewritten ASL.

Knowledge of hearing and speech disability cultures, languages and etiquette.

Clear and articulate voice communications.

Understanding of the CA's role in the relay process.

Training on how to deal with difficult or stressful situations.

3.3.2.1 The Offeror shall describe how it will screen applicants for CA vacancies to determine eligibility for employment. Sample tools used for this purpose shall be included with the response.

3.3.2.2 The Offeror shall describe its CA training program. This description should minimally include the length of training as well as identify trainers and training media used. Additionally, the Offeror should include training curriculum

and other supportive materials that demonstrate its superiority in this area.

3.3.2.3 The Offeror shall describe how CA's will be evaluated, monitored, retrained and upgraded so that they meet or exceed the requirements in paragraph 3.3.2.

3.3.3 The CA who receives a TTY based TRS call must stay with that call for minimum of ten (10) minutes. Describe the technology and procedure in the event a call must be transferred to another CA. CA's handling an STS call must stay with the call for a minimum of fifteen (15) minutes.

3.3.4 Proposals must address the following aspects of call processing performed by a CA (call processing relates to the way a CA announces the call, voices, types or otherwise becomes involved in the direct handling of a relay call). Include sample scripts, where appropriate, in this response.

Customer preference for the way a call is processed

Interpretation versus transliteration

Use of parentheses

Keeping the user apprised of call status

Announcing the call

Explaining relay to new users

Voice inflection, meaning and tone

Correcting spelling or grammatical errors (automatic spelling correction software is a desirable feature)

Identification of CA and his/her gender

3.3.5 The Vendor must make the best effort to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

3.3.6 Conversations between TTY and voice callers shall transmit in real time.

3.3.7 CA's shall have the ability to request a supervisor's assistance by initiating an audible and visual alarm (with the touch of a button) that clearly identifies the location of the CA. Proposals must include details on how this will be accomplished in the proposed relay center.

3.3.8 CA's must conduct themselves in a professional manner at all times while representing the TRS. Proposals must include a "Code of Ethics" that CA's and others employed at the TRS will abide by and describe measures that will be used to enforce these ethics.

3.3.9 The Offeror must include an organizational chart depicting, at a minimum the following: hierarchical flow, position titles, and number of people occupying each position. This chart must demonstrate the relationship

between the lowest classified employee and the highest position associated with the corporation.

3.3.10 Proposals must include the following if the proposal involves the use of a subcontractor:

An organizational chart of where a subcontractor is used depicting the relationship of authority between the parties.

A copy of the contract between the vendor and the subcontractor must be provided.

A reference list of three (3) companies must be provided for any proposed subcontractors including name and contact information.

The awarded vendor must provide proof of payment to any subcontractors used for this project. Proposals shall include a plan by which the State will be notified of such payments.

The primary vendor must notify the Public Service Commission of the intended use of any subcontractors not identified within the response to this RFP and receive approval prior to the subcontractor commencing work.

3.4 Billing

3.4.1 The Offeror shall demonstrate how charges to the TRS user will be functionally equivalent to voice calls. Any discount offered must apply to all TRS users. Discount rates must be identified within the proposal.

3.4.2 TRS users shall have the option to use their credit card, make person to person calls, collect calls, and alternate billing methods normally available to the general telephone user. Please explain how these forms of billing will be made available to the end user.

3.4.3 The Offeror must address how it will deal with the rating and processing of long distance calls made from pay telephones when the caller desires to use coins to pay for a particular call. The industry team working on this effort laid the foundation for a temporary solution to this problem. The Offeror must describe its current efforts in this area, and what it plans to do when the FCC waiver terminates.

3.4.4 The Offeror must specify the system for identifying and documenting long distance and toll calls for billing purposes. The record shall contain, at a minimum, the following information:

Telephone number or credit card number to bill
Originating telephone number
Terminating telephone number
Date

Start time (the time the calling party is initially connected to the called party or to an answering machine at the called party's number or to a recorded message or intercept for the called number)

End time (the time when either the called party or the calling party hangs up)

Call duration to the nearest 100th of a second

- 3.4.5 The Offeror must fully describe the billing system and billing process that will be used, including identification of subcontractors, specific duties of the subcontractors, how the billing record detail will be transmitted to the billing agent (if any) and how charges will appear on the customer's bill.
- 3.4.6 The State desires to see evidence that the provider will be able to bill extended community coverage plans, optional calling plans and other special situations such as limits on directory assistance calls where applicable.
- 3.4.7 The Offeror must describe its billing procedure to the State for the provision of relay services. The Offeror must include in its proposal a sample bill that will be evaluated for its ease of understanding; clarity of information and ability to be easily reconciled with existing traffic data.
- 3.4.8 The Offeror shall bill the State for relay use on a session minute basis as defined in this RFP. The Offeror must describe how minutes will be timed on each call and assure the State that timing per session will be rounded up to the nearest tenth of a minute. This specification relates to the minutes that will be billed to the State including call set up and wrap up times.

3.5 Education and Outreach

- 3.5.1 The Offeror shall provide a separate toll free telephone number to be used to help new users understand what TRS is and how it works. A caller, TTY or non-TTY user, can be referred to this number and receive instructions on the use of the relay, relay features, and any questions or problems the user may have related to TRS. This customer service number will also be a point of contact for people wishing to compliment or, if necessary, file a complaint about the service. Please describe how this service requirement will be provided, including the operational hours of this customer service line.
- 3.5.2 The Offeror shall fully describe its Customer Service element. This description shall include at a minimum: staffing (include position descriptions) associated with this activity, specific activities designed to promote relay use, number of "person hours" per month and strategies for reaching hard to reach individuals such as people with a speech disability, hard of hearing people, and elderly people.

- 3.5.3 The Offeror shall develop an outreach and educational program for TRS users. This shall be accessible statewide, in a format easily understood by the user and updated as changes to the TRS occurs. Please describe the program you will use for this purpose. Identify all staff associated with this activity. The Offeror will promote the service by generically advertising the existence and use of TRS in Utah. Please describe what methods of advertisement you would utilize and offer sample media materials. Identify costs as well of what services, products, and materials would be provided. If an advertising agency is involved with the Commission, please explain how the Offeror will coordinate services.
- 3.5.4 Please identify and describe other promotional materials designed to document the TRS telephone numbers, provide general instruction on the use of TRS, etc. The Offeror should attach sample materials in the Appendix section of the proposal.
- 3.5.5 *Relay Utah Consumer Council:* The awarded vendor shall work with the Commission in order to provide at minimum meeting facilities, qualified ASL interpreters, captioning services for Council meetings, and per diem for some members. This Council meets quarterly.

3.6 References

Offerors shall provide a minimum of three (3) written references from similar projects performed for private, state, and/or large local government clients at the present time. Vendors are required to submit **Attachment A, Reference Form**, to the business references listed. The business reference must submit the Reference Form directly to the Public Service Commission. It is the Offeror's responsibility to ensure that the completed forms are received by the Commission on or before the proposal submission deadline for inclusion in the evaluation process. Any Business Reference Forms that are not received, or are not complete, may adversely affect the vendor's score in the evaluation process. The Public Service Commission will contact all business references for validation of information submitted.

The Offeror must provide a list of the following information for its three business references:

- 3.6.1 Business/Agency Name
- 3.6.2 Project Description
- 3.6.3 Project Dates (start/end)
- 3.6.4 Staff member(s) assigned to project that will be designated for work per this RFP
- 3.6.5 Client project manager name, telephone number, fax number, and e-mail address
- 3.6.6 Brief description of the working relationship between the Offeror and the reference

The results of the business references and then validation will be provided to the RFP Evaluation Team and used in scoring the written proposal. By submitting reference contact information, the Provider releases the reference from any ramifications resulting in the information provided. Any information provided by the reference will be kept confidential.

3.7 System Enhancement

These enhancements will be considered separately from the main TRS Cost Proposal. The Commission is interested in knowing what services can be provided and at what cost.

3.7.1 Video Relay Service (VRS)

Funding for VRS is currently the responsibility of the interstate TRS fund through the National Exchange Carriers Association (NECA). In case the State of Utah should become responsible for the future funding of this service, a price is requested for the processing of VRS calls. A separate line-item should be listed in the "Cost Proposal" related to VRS. All requirements for standard Relay services apply, unless specific requirements are stated in this section. The scope of work for these objectives may change if the FCC establishes alternative standards.

The purpose of Utah VRS is to provide the relay of phone conversation. VRS shall be defined as a communication link between one video relay user to the VRS operator who connects to a standard phone user and vice versa. A relay caller uses video equipment to place a call to the VRS. The video interpreter at the awarded vendor's site voices what the caller signs and interprets what the standard phone user says.

In issuing this RFP, the Commission is pursuing the following specific objectives to offer VRS:

- 3.7.1.1 To contract with a qualified vendor to provide an interactive video communication service that utilizes a sign language interpreter at the awarded vendor's site (or other designated location) to provide VRS to individuals using their own video conference equipment. This service allows translation from sign language to voice rather than from text to voice.
- 3.7.1.2 To establish Video Relay to ensure functionally equivalent relay service for persons who rely on visual modes of communication.

- 3.7.1.3 To meet or exceed all FCC requirements related to VRS.
- 3.7.1.4 The awarded vendor must provide a VRS system that allows translation from sign language to voice rather than from text to voice. A relay caller uses video equipment to place a call. The interpreter at the relay center translates the caller's sign language to voice to complete a call to a standard phone user. VRS must allow audio as well as video transmission to and from the VRS user, in order to provide VCO, 2-Line VCO, and HCO calls to be processed via VRS.
- 3.7.1.5 *Bandwidth and Video Standards:* The awarded vendor must provide an IP based video system, which conforms to ITU standards for H.323 and H.320 videoconference standards. The video quality must be of sufficient clarity to make the signing understandable. Bandwidth for transmission must be no less than 384 kbs at all times. The only exception would be when the incoming call is less than 384 kbs. The systems must be capable of meeting the incoming speed of the video call.
- 3.7.1.6 *Interpreters:* The awarded vendor shall employ qualified interpreters who are proficient expressively and receptively in ASL, Signed English, PSE, and oral interpreting. VRS interpreters will function as fully trained Relay Utah Operators and must adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics.
- 3.7.1.7 *Reports:* Because the State of Utah is technically responsible for the quality of VRS services provided for Utahns, the Commission requests monthly reports on VRS to be provided, even if the State is not financially liable to the awarded vendor for VRS. These reports should at least include call volume, minutes of use, and complaint information.
- Should Utah become financially liable to the awarded vendor for VRS, the monthly reports are to be the same as those for standard Relay Utah calls, where possible. Reports will be submitted to the Commission on the 21st of each month following service, unless otherwise specified.

- 3.7.1.8 *Customer Use Tracking System or IP Based System:* Should the State of Utah become responsible for funding VRS, the awarded vendor shall establish a system to track inbound call usage by a PIN system and report usage to the State.
- 3.7.1.9 *System Design and Capability:* The awarded vendor must have a plan to provide VRS which includes, but is not limited to, access capabilities options, video and audio transmission capabilities, and any special features of the system.
- 3.7.1.10 *Compatibility with VRS Users:* The awarded vendor must make available to the user the compatibility requirements necessary for the user to access VRS from a personal computer (PC).
- 3.7.1.11 *IP Relay Access to VRS:* The awarded vendor must have the capability to measure:
- The number of requests for VRS that cannot be filled because all operators are busy.
 - The number of requests for VRS that cannot be filled for other reasons (to include reason).
- 3.7.1.12 *Center Staffing:* The VRS Center must have sufficient staff of Interpreter/Operators (I/O) at the time of award and have the capability to expand I/O staff as necessary. (I/O staff are composed of CA's who communicate in ASL and not by a TTY. They function just like a CA and must meet all of the same requirements.)
- The awarded vendors must employ at a minimum, two (2) Interpreter/ Operators during the hours of operation of VRS.
- The awarded vendor must ensure that staffing allows for interpreter down time to ensure that the quality of calls meets the standards detailed in this RFP.
- 3.7.1.13 *Hours of Operation:* VRS must at least be available Sunday through Saturday, 9:00 am to 7:00 pm, Mountain Standard Time, including holidays.

3.7.1.14 *Minimum Standard for Service:* Please describe how your company will meet the FCC's minimum standards for VRS.

3.7.1.15 *Costs:* Vendors shall include all costs associated with VRS in their Financial Proposals.

3.7.1.16 *VRS Reports:* All reports are due to the State on the 21st of each month following service unless otherwise specified, and must include the following:

Monthly Call Report

- Number of requests for VRS
- Number of requests for VRS not filled (and reasons)
- Call wait time
- Number of calls processed
- Average length of call (monthly)
- List of PIN codes accessed and call duration
- Number of outbound calls
- Total Minutes of use (session time)
- Total Minutes of setup and wrap up

Complaint Report

- Daily Complaint/Commendation Report
- Customer information (if given)
- Date, time of complaint
- I/O Identification
- Nature of complaint/commendation
- Complaint resolution

Please refer to Section 4.2.2 for pricing instructions.

3.7.2 Captioned Telephone with VCO Service or Enhanced VCO with Voice Recognition TRS

It is desirable for the Public Service Commission to provide Captioned Telephone with VCO Service or Enhanced VCO with Voice Recognition TRS. Outside of the mandatory requirements and waived requirements, outlined in the FCC Declaratory Ruling on Captioned Telephone VCO on August 1, 2003, additional requirements are outlined:

3.7.2.1 *Minimum 125 Words Per Minute:* Word per minute is not the

voicing speed of the CA, but it is the speed at which a user is receiving information.

- 3.7.2.2 *98% accuracy:* Accuracy is the percentage of error subtracted from 100%
- 3.7.2.3 *2% or less Error Rate.* Errors are any word that changes the context of the sentence, including missing words or sentences.
- 3.7.2.4 *Pricing:* Pricing for this desirable feature should be for the rate per minute for Captioned Telephone with VCO Service or Enhanced VCO with Voice Recognition TRS only and foresee the need for at least 10 units a month. As of the release of this RFP approximately 40 Captioned Telephones with VCO have been distributed on a trial basis. The lowest price per minute will receive the highest score of 25 points, with higher proposals receiving a percentage of the points.

3.7.3 Internet Protocol Relay (IP Relay)

Funding for IP Relay is currently the responsibility of the interstate TRS fund through the National Exchange Carriers Association. In case the State of Utah should become responsible for the future funding of this service, a price for this service is requested for the processing of IP Relay calls. A separate line-item should be listed in the "Cost Proposal" related to IP Relay. All requirements for standard Relay services apply, unless specific requirements are stated in this section. The scope of work for these objectives may change if the FCC establishes alternative standards.

- 3.7.3.1 *Reporting System:* Because the State of Utah is technically responsible for the quality of IP Relay provided in the State, we ask that monthly reports on IP Relay be provided, even if the State is not financially liable to the awarded vendor for the service. These reports should at least include call volume, minutes of use as well as complaint information.

Should the State of Utah become financially liable to the awarded vendor for IP Relay, then the awarded vendor shall offer a reporting system that provides detailed information on usage, busy times, visitors to site, requests for IP Relay calls, IP calls unable to be processed due to unavailable operators, length of calls, total number of calls handled, operator staffing, and other pertinent information needed to manage the

service and provide periodic assessment of the level of access and quality of the service.

- 3.7.3.2 *Calls Not Terminating In Utah:* Should the State of Utah become responsible for funding IP Relay, the awarded vendor agrees to establish a Personal Identification Number (PIN) system in coordination with the State. Users will be required to use their PIN to make calls that do not terminate in Utah.
- 3.7.3.3 *FCC Standards:* Please describe how your company will meet FCC rules related to IP Relay.
- 3.7.3.4 *Relay Utah Standards:* IP Relay must meet all of the established standards for Relay Utah calls with the exception of billing, 900 calls, and emergency calls. The awarded vendor shall inform the Commission of the number of requests for IP Relay that were not met. The ASA shall be at least 85% of all calls answered in 10 seconds, measured from the time the user arrives at the IP Relay server to the time the call arrives at a workstation ready for the operator to process the call.
- 3.7.3.5 *Expenses:* All expenses associated with IP Relay, including any long distance or toll calls, will be included in the overall reimbursement rate.
- 3.7.3.6 *Reporting Abuse:* Should the State of Utah become responsible for funding IP Relay, the awarded vendor must provide the State a monthly usage report by PIN code that shall be used to provide information on the frequency and duration that users are accessing the service. The State may request the blocking of specific PIN codes that have exceptionally high usage and are suspected of being abused.
- 3.7.3.7 *Hours of Operation:* IP Relay Utah will operate 24 hours a day, 7 days a week, 365 days a year.
- 3.7.3.8 *Complaint Procedures:* Complaint procedures are to be the same as those for standard Relay Utah calls.
- 3.7.3.9 *Monthly Call and Complaint Reports:* The monthly reports are to be the same as those for standard Relay Utah calls, where possible, and must be provided on the 21st of each month.

3.7.4 Any Other Desirable Features

The Utah Public Service Commission is seeking information about any other ideas for other technology, services, or products which can be provided that are not included in this RFP or required by the FCC. The Commission seeks to provide the best possible TRS to Utahns and is looking for information from the Offeror about ingenuity with respect to technical innovations. Please enumerate these innovations, if any, and explain why they would be useful.

4. COST PROPOSAL

4.1 General Instructions

The cost proposal must be submitted in a separate envelope, clearly marked “**Cost Proposal**” on the outside of the envelope, with the written proposal. The proposal will be scored using a standard quantitative calculation where the greatest points will be awarded to the proposal with the lowest cost. Various costing methodologies and models may be used to analyze the cost information submitted to determine the lowest costs to the State.

4.2 Cost Proposal Format

The cost proposal will be scored using Offeror responses to the assumptions regarding call volume. Offerors shall identify a rate per session minute. If Offerors have discounts on a per minute basis regarding escalating traffic, then the Offeror can create its price discounts based on volume traffic as wide or as narrow as it deems appropriate. Please provide a discount matrix if applicable.

Relay Utah TRS traffic has a call volume of approximately 35,000 calls per month. For a more in-depth look at Utah’s TRS Traffic, please refer to Attachment B.

The costs for System Enhancements (Captioned Telephone with VCO, IP Relay, VRS) will be considered separately from the TRS rate per session minute.

Detailed worksheets used to derive the cost quotations may be requested by the State during the review process and shall be provided by the Offeror. Failure to comply will result in the rejection of the proposal.

4.2.1 The State requires the Offeror to identify a cost per minute for TRS.

4.2.2 The State requires the Offeror to identify the costs associated with VRS, if the Vendor is able to provide the service.

4.2.3 The State requires the Offeror to identify the cost of Enhanced VCO Services, if the Vendor is able to provide the service.

4.2.4 The State requires the Offeror to identify the cost of IP Relay, if the Vendor is able to provide the service.

4.3 Fixed Price Period

Proposals must include a statement that all prices, costs, and conditions outlined in the proposal shall remain fixed and valid for the period between the due date for proposals and the award of the contract.

5. SPECIAL CONTRACT TERMS AND CONDITIONS

5.1 Contractor Transition Period

5.1.1 The Utah TRS must be operational no later than **January 28, 2005**. Liquidated damages will be assessed for each day that the contract conditions are not met.

5.1.2 Proposals must include a plan for transitioning the existing Utah Telecommunications Relay Service to the new one. This plan must describe, at a minimum: public relations efforts, site location, time frames for staff and equipment selection, and a cutover procedure that will ensure a transparent transition to the new Utah TRS.

5.2 Payment Requirements

Payment(s) to the vendor shall be calculated by totaling the relay session minutes for a given month multiplied by the rate per minute as identified in this RFP. The rate per minute will vary per month according to the amount of minutes used with discounts given for high utilization. Request for payment shall be sent to the following address and under the conditions specified in this RFP.

TRS Contract Administrator:
Julie Orchard, Commission Secretary
Heber M. Wells Bldg., 4th Floor
160 East 300 South
Salt Lake City, Utah 84111
Phone: (801) 530-6716

5.3 Liquidated Damages

The Contractor acknowledges that liquidated damages will be incurred by the State for each working day past the scheduled delivery dates. The Contractor agrees that the State shall have the right to liquidate through deduction from the Contractor's invoices, in an amount equal to said damages incurred, or by direct billing of the

Contractor in the event an alternate provider is needed to ensure the continuance of relay services in the State.

Additionally, the liquidated damages shall be assessed if and when there is failure to comply with the following conditions occur, with a limitation of one assessment per day, even if multiple violations occur:

- Reports and bills are not received by the Contract Administrator by the 21st of each month;
- Customer Service Department is not available during the agreed upon hours;
- Blockage rate does not meet the required $p=.01$ daily grade of service;
- Speed of answering does not meet the required 90 percent of all calls answered within ten seconds as measured on a daily average; and
- A system outage occurs in excess of two hours in a twenty four-hour period.

The Contractor and the State acknowledge that these damages are difficult to precisely determine. Both parties agree that a reasonable estimate of damages shall be \$2,500 per day for Contractor's failure to meet scheduled delivery dates, and \$2,500 per day per incident of Contractor's non-compliance with contract conditions.

Liquidated damages will not be assessed when failure to meet contract requirements is caused by forces or factors outside the control of the contractor. Examples of such conditions would be in the event of a national disaster or national emergency. Outages of any kind will be reported to the Contract Administrator within four (4) hours of the occurrence.

6. PROPOSAL EVALUATION AND AWARD PROCESS

6.1 Review of Mandatory Requirements

The proposals will first be reviewed to determine if mandatory requirements were met. Failure to meet mandatory requirements may result in rejection of the proposal.

6.2 Proposal Scoring

All proposals submitted and accepted will be reviewed by an evaluation committee and scored against the stated criteria. The committee may review references, request oral presentations, and perform test calls. All of the aforementioned results will be used in scoring the proposals. The evaluation committee's scoring will be tabulated and proposals ranked based on the numerical scores received.

6.3 Award

The award will be granted to the highest scoring responsive and responsible Offeror. The award will be based on the scoring as shown in Section 6.6, Evaluation Criteria.

6.4 Right to Reject Proposals and Negotiate Contract Terms

The agency reserves the right to reject any and all proposals and to negotiate the terms of the contract, including the award amount, with the selected Offeror prior to entering into a contract. If contract negotiations cannot be concluded successfully with the highest scoring Offeror, the Agency may negotiate a contract with the next highest scoring Offeror.

6.5 Financial Stability

Proposals that do not comply with instructions, or are unable to comply with specifications contained in this RFP, may be rejected by the State. The State may request reports on a vendor's financial stability, and if financial stability is not substantiated, may reject a vendor's proposal. The State retains the right to accept or reject any or all proposals, or accept or reject any part of a proposal deemed to be in the best interest of the State. The State shall be the sole judge as to compliance with the instructions contained in this RFP.

6.6 Evaluation Criteria

The proposals will be scored on a **1,000 point** scale using the following criteria:

MANDATORY (no points awarded)

- Compliance with FCC rules, PSC rules and RFP contents
- Supply all necessary telecommunications equipment
- Uninterruptible power, switching system, etc.
- 24 hours per day, 7 days per week, 365 days per year
- Multiple calls per contact with no time limitation
- All calls must originate or terminate in Utah
- Access to carrier of choice (i.e. built into customer profile)
- Access to operator services consistent with voice users

SYSTEM DESIGN/MAINTENANCE (200 points)

- Text-to-voice and voice-to-text
- VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO
- HCO, two-line HCO, HCO-to-TTY, and HCO to HCO
- Speech to Speech
- Non-English translation
- All calls held in strict confidence
- System shall receive and transmit in Baudot, ASCII, etc.
- Alternate protocol
- Handling emergency calls
- Reports to Contract Administrator
- Grade of service to be $p=.01$
- Intercept message used if system goes down
- 90% of calls answered in 10 seconds

Answering machine, voice mail retrieval, and IVR's
Upgrades in technology
Access to regionally restricted 800 numbers and pay for service numbers
Demonstrate ability to adapt to volume fluctuations
Automated as possible with macro functions
Communication among CA's, supervisors and administration
Customer profile
Method of releasing calls from the CA
Caller ID
Call release functionality
Speed dialing functionality
Three-way calling functionality
Complaint Resolution
Carrier of Choice
Enhanced Protocol/Turbo Code
900 Services

COMMUNICATIONS ASSISTANT'S SERVICES (150 points)

CA's announce all calls
CA's skills: 60 wpm, grammar, spelling diction and intonation
CA's screening process (pre-employment)
CA's training program (instructors certified in communication for the deaf)
CA's evaluation, monitoring, upgrading of skills
CA to handle call for at least 10 minutes, STS CA's for 15 minutes
Call processing elements
CA's ability to call a supervisor; audible/visual alert
CA's code of ethics
Organizational chart showing employees relationship
Use of subcontractors

BILLING (125 points)

Charges to TRS users functionally equivalent
Call options: credit card, person to person, collect calls, etc.
Use of coin sent paid option via pay telephones
Call detail record
Identification of billing process and subcontractors if any
Adaptation to calling plans, extended community coverage, etc.
Billing procedures to the State
Timing of session minutes and rounding off to the nearest 10th of a minute

EDUCATION AND OUTREACH (75 points)

Customer service number
Customer service program
Customer service line report
Educational program for new users
Advertising of service
Other promotional materials

REFERENCES (30 points)

Reference Forms (3)

SYSTEM ENHANCEMENT (40 points)

IP Relay

Video Relay Service

Enhanced Voice Carry Over Service

Other Desirable Features/Technical Innovations

IN-KIND DONATIONS (30 points)

Any additional system enhancements, products, or services not presently required by the FCC or this RFP but that can be provided at no additional cost.

TEST CALLS (50 points)

COST PROPOSAL (300 points)

This section is submitted separately (see Attachment C) and is based solely upon the TRS cost proposal. The prices for Captioned VCO Telephone Service, IP Relay, or VRS are to be submitted but will not be evaluated with TRS cost per session minute.

6.7 Notification of Award

A Notification of Intent to Award a contract will be sent to the selected bidder by the Department of Administrative Services, Purchasing Division and copies sent to all other bidders, at least five (5) working days prior to signing of a contract. This Notification of Intent to Award a contract is the State's letter of intent to contract with the selected bidder and does not constitute a contractual commitment.

Attachment A

REFERENCE QUESTIONNAIRE

The State of Utah's Public Service Commission, as part of the Request for Proposal process, requires proposing vendors to submit a minimum of three (3) business references. The purpose of these references is to document the experience relevant to the scope of work and provide assistance in the evaluation process.

The proposing vendor is required to send the following reference form to each business reference listed. The business reference, in turn, is requested to submit the Reference Form directly to the Utah Public Service Commission by the RFP submission deadline of 3:00 p.m. on Tuesday, July 13, 2004 for inclusion in the evaluation process. Please return this form to Allison Flanders with the Commission via facsimile at (801) 530-6796 or by e-mail to aflanders@utah.gov. For any questions or concerns then please contact Allison Flanders by e-mail or by telephone at (801) 530-6769 (V/TTY). The form and the information provided will become a part of the submitted proposal. The business reference will be contacted for validation of the response as well as to answer any questions which may arise.

**REFERENCE QUESTIONNAIRE
FOR:**

Vendor Name

Any information provided will be kept confidential.

Company name	
Contact person's name	
Contact person's title	
Telephone number	
E-mail address	

Questions

1. In what capacity have you worked with the Vendor?
2. How would you rate the Vendor's expertise and knowledge related to the provided products or services?
Excellent, Satisfactory, or Unsatisfactory
Any comments?
3. How would you rate the Vendor's service(s) and/or product(s) provided?
Excellent, Satisfactory, or Unsatisfactory
Any comments?
4. With which aspect(s) are you most satisfied with this vendor?
Any comments?
5. With which aspect(s) are you least satisfied with this vendor?
Any comments?
6. How would you rate the vendor's flexibility with changes to service or products?
7. What is your level of satisfaction regarding any reports or other materials produced by the

vendor? Excellent, Satisfactory, or Unsatisfactory
Any comments?

8. Describe the working relationship between the vendor and your staff.

9. Would you choose to work with this vendor again for future projects or services?
Yes or No?
Any comments?

Thank you for your time and cooperation.

Please send by facsimile to (801) 530-6796 or send an electronic message to
aflanders@utah.gov.

Attachment B

RELAY UTAH HISTORICAL DATA – 2003

Month	Number of Session Minutes
January	159,820
February	144,797
March	151,845
April	159,464
May	164,536
June	152,199
July	157,550
August	149,367
September	141,817
October	147,216
November	131,579
December	141,468
Total Session Minutes - 2003	1,801,358

Attachment C

COST PROPOSAL

RFP # DG 4016

Cost is to be submitted based on the following:

(Any deviation from this format may result in disqualification of proposal)

Company Name: _____

TRS Rate Per Session Minute \$_____/minute

System Enhancements (if applicable and to be evaluated separately)

Captioned Telephone VCO Service \$_____/minute

IP Relay \$_____/minute

Video Relay Service \$_____/minute

Appendix S: Copy of Substantive Change Letter

September 25, 2007

Thomas Chandler, Chief
Disability Rights Office
Consumer and Governmental Affairs Bureau
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Changes to Utah Telecommunications Relay Services

As the Administrator for the Utah Public Service Commission and Relay Utah, I wanted to ensure that Utah is in compliance with FCC rule 47 C.F.R. § 64.605 (f)(1) by notifying the Federal Communications Commission of a substantive change to the state's TRS program, Relay Utah. The change first transpired in 2003 by participating in a trial program of the Captioned Telephone Service, CapTel. In 2005 after participating in the trial, Relay Utah, did implement CapTel by amending the Relay Utah TRS contract with Sprint. The Commission and Relay Utah continues to meet the federal minimum standards after implementing this substantive change.

Please accept this letter certifying the change to Utah's TRS program. If you have any questions, then please do not hesitate to contact me at (801) 530-6713 or jorchard@utah.gov. The Utah Public Service Commission, in the best interest of Relay Utah, continues to work in conjunction with the FCC and strives to provide the best possible relay service for Utah residents.

Respectfully,

/s/ Julie Orchard
Commission Secretary
TRS Administrator
(801) 530-6713
(801) 530-6796
jorchard@utah.gov

cc: Marlene Dortch, Commission Secretary

Appendix T: Outreach Information – Presentations, Website, Storyboard, Advertisements, Flyers, Brochure

Relay Utah Open Houses

2006

11/28/2006 Taylorsville

10/25/2006 St. George

2005

11/9/2005 St. George

11/2/2005 Logan

10/19/2005 Taylorsville

10/18/2005 Orem

2003

10/20/2003 Logan, Provo, St. George, and Taylorsville

Relay Utah Presentations Completed

2007

06/13/2007 Heritage Senior Center [Clearfield] (50 attendees)

05/24/2007 Three Link Tower [Ogden, affordable housing center] (25 attendees)

05/17/2007 Weber Human Services [Ogden] (30 directors at senior centers and nutrition centers)

05/11/2007 South Jordan Senior Center

05/09/2007 Liberty Senior Center [Salt Lake] (40 attendees)

04/20/2007 Fellowship Manor [affordable housing complex in Ogden] (12 residents)

03/06/2007 Union Gardens [Ogden]

03/08/2007 Golden Link Manor [Ogden affordable housing complex in Ogden] (20 residents)

03/22/2007 Riverdale City Senior Center

2006

01/09/2006 Columbus Senior Center (SLC) (75-80 attendees)

01/11/2006 Tooele County Senior Citizens Center (65 attendees)

02/02/2006 Richfield Senior Citizen Center (39 attendees)

02/16/2006 South Summit Senior Center (45 attendees)

03/22/2006 Provo Eldred Center (80 attendees)

03/29/2006 Golden Hours (40 attendees)

04/13/2006 Harmon Home Senior Center [West Valley] (7 attendees)

04/27/2006 Orem Senior Friendship Center (100 attendees)

05/03/2006 Harmon Home Senior Center [West Valley] second presentation (40 attendees)

07/17/2006 Taylorsville Senior Center (35 attendees)

08/08/2006 Friendly Neighborhood Center, SLC (45 attendees, also sent newsletter)

09/27/2006 Midvale Senior Center (20 attendees)

09/28/2006 Riverton Senior Center (100 attendees)

10/05/2006 West Jordan Center (20 attendees)

10/09/2006 Northwest Multi-Purpose Center [Salt Lake] (45 attendees)

10/11/2006 Grand County Senior Center [Moab] (100 attendees)

10/16/2006 Golden Years Center [Bountiful] (50 attendees)

10/24/2006 Annual Open House, St. George
11/20/2006 Draper Senior Center
11/28/2006 Annual Open House, Sorensen Center, Salt Lake City
12/07/2006 Mount Olympus Senior Center, Salt Lake City

2005

01/20/2005 Morgan Senior Center
01/27/2005 Ephraim Senior Center
01/28/2005 Cedar City Senior Center
01/31/2005 Huntington Senior Center
02/01/2005 Castledale Senior Center
02/04/2005 Payson Senior Center
02/11/2005 Cache County Senior Center (Logan)
03/09/2005 Brigham City Senior Center (100 includes attendees and homecare)
03/17/2005 Roy Hillside Center (40-50 attendees)
03/24/2005 Golden Age Center (Vernal, 60-80 attendees)
04/04/2005 Farr West Center (55 attendees)
04/20/2005 Hyrum Senior Citizen's Center (50-60 attendees)
04/22/2005 Santaquin Senior Citizen's Center (70-75 attendees)
04/25/2005 Enterprise Senior Center (35 attendees)
04/26/2005 St. George Senior Center (5 attendees)
04/27/2005 Hurricane Senior Center (50 attendees)
05/09/2005 Options for Independence (Outreach program to Logan seniors)
05/18/2005 Professionals for Seniors (Represents 15-20 agencies in Logan that serves seniors)
05/24/2005 Ferron Senior Center (30 attendees)
05/25/2005 Green River Senior Center (20 attendees)
05/26/2005 Karl Peterson Senior Center (Price) (100 seniors)
05/27/2005 East Carbon Senior Center (25 attendees)
06/02/2005 Gateway Senior Center (Duchesne). (60-65 attendees)
06/09/2005 Beaver Senior Health & Information Expo
06/15/2005 Coalville (35-40 attendees)
06/17/2005 Tremonton Senior Citizens Center. (35 attendees)
06/22/2005 Emery Friendship Center. (40 attendees)
07/05/2005 Crossroads Sr. and Community Center, Roosevelt (70 attendees)
09/16/2005 Murray Heritage Center. (20 attendees)
11/02/2005 Smithfield City Senior Citizen's Center (80 seniors)
11/10/2005 South Sevier Senior Center, Monroe (30 seniors)
12/05/2005 Park City Senior Citizens Center (30 seniors)
12/16/2005 Coalville Senior Center (25 seniors)

2004

1/09/04 Friendly Neighborhood Center
1/13/04 Grantsville Center
2/11/04 South Jordan Senior Center
2/19/04 Wasatch County Senior Citizens Center
2/27/04 Draper Senior Center
3/03/04 Richfield Senior Center
3/04/04 Kanab Senior Center
3/08/04 Columbus Senior Center (Salt Lake City)
5/12/04 Northwest Senior Center (Salt Lake City)
5/14/04 Mount Olympus Senior Center
5/19/04 Eldred Senior Center (Provo)

5/20/04 Riverton Senior Center
5/26/04 Sandy Senior Center
10/12/04 West Jordan Senior Center
10/18/04 Tenth East Senior Center (Salt Lake City)
10/19/04 Weber Human Services, presentation to Sr. Center Directors
10/21/04 Spanish Fork Senior Center, approx. (225 attendees)
10/25/04 Midvale Senior Center
10/27/04 Blanding Senior Center
11/15/04 Senior Companions (Provo)
12/07/04 Liberty Senior Center (formerly Central City Community Center)
12/14/04 Sunday Anderson Westside Senior Center

2003

7/09/03 Murray Clark Cushing Heritage Center (SLC)
7/22/03 Clearfield Heritage Center
8/05/03 Liberty Senior Center (SLC)
 Woodland Park Care Center (SLC)
8/06/03 Kaysville Autumn Glow Center
8/08/03 Tooele Senior Center
8/11/03 Hazen Nursing Home (West Valley)
8/12/03 Harmon Home Community Center (West Valley)
8/14/03 Midtown Manor Care Center (SLC)
 Golden Years Center (Bountiful)
8/15/03 Federal Heights (SLC)
8/28/03 Seville Retirement Residence (Orem)
9/16/03 Weber Senior Nutrition Center (Ogden)
10/16/03 Taylorsville Senior Center
 Cove Point Retirement (Provo)
10/27/03 Milford Senior Citizens Center
10/28/03 St. George Senior Citizens Center
11/03/03 Hurricane Senior Citizens Center
12/12/03 Orem Senior Friendship Center
12/07/03 Jacobs Senior Center, Pleasant Grove

###

[home](#) | [directory](#) | [FAQs](#) | [contact us](#)



Helping Utah Connect • Dial **711**

[About Relay Utah](#)
[Relay Utah 7-1-1](#)
[Equipment & Instructions](#)
[Who Qualifies](#)
[News & Events](#)
[Related Websites](#)

> [2006 Marks Relay Utah's Highest Level of Assistive Telecommunication Equipment Distribution To Utah's Deaf And Hard of Hearing Since Program's Introduction](#)

[Utah Public Service Commission's Relay Utah Now Offers Amplified Cordless Phone For Hard of Hearing](#)



WELCOME TO RELAY UTAH

The Relay Utah service was initiated in 1988 as one of the first Relay services established in the United States. Housed under the umbrella of the Public Service Commission, Relay Utah provides access to hearing assistive equipment and telephone relay services, through Sprint, to allow Utah citizens who are deaf, hard of hearing or speech disabled more efficient communication.

> [Funding Awards](#) for Sign Language Training Program [more >>](#)

[Relay Utah Advertising](#)

> 

The NEW phones are here... [more >>](#)

> [Event Schedule](#) [more >>](#)

APPLICATION FORM:

 [English](#) [PDF](#) [Word](#)



[See the new Utah Relay TV Ad](#)

Purpose: More than 220,000 Utahns are either deaf or hard of hearing. Relay Utah strives to make it possible for these individuals and those who have difficulty with speech to independently communicate with each other and with the hearing community. Over 35,000 calls are made through Relay Utah every month.

Individuals who use text telephones and desire to communicate in Spanish can dial Relay Utah and inform the CA of their preferred message translation. The CA will relay the conversation in the preferred translation, including Spanish-to-Spanish, Spanish-to-English or English-to-Spanish.

[Sprint Brochure](#) - Your communication solution with Sprint and Relay Utah

WHO CAN I CONTACT:

For more information about Relay Utah, TTY's or the Public Service Commission, contact:

Equipment Distribution:
Mary Beth Green
 Public Service Commission
 160 E. 300 S., 4th Floor
 Salt Lake City, UT 84111
 (801) 530-6638 (V/TTY)
mbgreen@utah.gov

General Information:
Trixie Behr
 Public Service Commission
 160 E. 300 S., 4th Floor
 Salt Lake City, UT 84111
 (801) 530-6769 (V/TTY)
tbehr@utah.gov

Media Relations:
Stephanie Miller
 PPBH
 1706 South Major Street
 Salt Lake City, UT 84115
 (801) 487-4800 Ext 107
smiller@ppbh.com

Sprint Contact Information:
 TTY: 1-800-346-4128
 Voice: 1-888-735-5906 Spanish:
 1-888-346-3162
 Customer Service:
 1-800-676-3777

PENNA
POWERS
BRIAN
HAYNES

CLIENT: RELAY UTAH
DATE: APRIL 10, 2006
TITLE: "FAMILY PORTRAIT" :30 TV
ISCI: RELY6013



BOBETTE: When mom's hearing started to go, even calling her on the phone became difficult.



JANICE: Her doctor was concerned she wasn't hearing instructions properly.



JED: But since she got her free CapTel phone we got mom back.



JED: The CapTel lets mom read what's



being said so she doesn't miss a word.



SIERA: I can tell her about all my soccer games.



BOBETTE: And I can talk to her just like I always did. Thanks Relay Utah.



JED: Amplified phones are also available. Contact Relay Utah for more information.



ALL: Thanks, Relay Utah!



All you need is one of these to contact the deaf or hard of hearing

A quick overview of the products and services available for the deaf and hard of hearing from Relay Utah.



Helping Utah Connect • Dial **711**

(801) 530-6716 • relayutah.gov

Make the Connection

For over 15 years, Relay Utah has provided the equipment and services necessary to enable Utah's deaf, hard of hearing and speech disabled population to connect with each other and the rest of the world.

Services for everyone:

711: A toll-free number available to anyone to communicate with the hearing or speech impaired. A Relay Communications Assistant (CA) "relays" the conversation.

Outreach Services: Relay Utah can provide education and training to senior centers, community clubs and organizations who are interested in learning more about available services and equipment.

Equipment and services for the deaf/speech disabled:

Text Telephones (TTY): Allow deaf or speech disabled persons to type conversations into the telephone. A Relay CA then reads the communication to the hearing person.



Video Relay Service (VRS): An Internet camera service that enables individuals to sign their communication to a Relay CA who then speaks it to a hearing individual.



Equipment and services for the hard of hearing:

Amplified Phones: Volume and multiple tone controls.

Voice Carry-Over (VCO): Service which allows a hard-of-hearing individual to read on a phone display what is being said to them, but allows them to speak directly to the person they are calling.



CapTel: A new technology that allows hard of hearing individuals to both hear and see what is being said. It utilizes voice-recognition technology to automatically transcribe what is being spoken.



NEW

For complete equipment lists, information on qualifying for equipment, arranging training or complete service information, make the connection by calling **(801) 530-6716** or visiting relayutah.gov.

Never miss a single word.

Don't just hear what they're saying, read it as well.



Phones for the deaf, speech
disabled and hard of hearing.
(801) 530-6716 • www.relayutah.gov


RELAY UTAH
Helping Utah Connect • Dial **7 1 1**

Never miss a single word.

Don't just hear what they're saying, read it as well.



Phones for the deaf, speech
disabled and hard of hearing.
(801) 530-6716 • www.relayutah.gov


RELAY UTAH
Helping Utah Connect • Dial **711**

When every word is critical, never miss a single one.



Make sure you take
2 pills every 4 hours
with a full glass of
water or milk until all
the pills are gone.

Ultratec

With this FREE service from Relay Utah, you'll never miss another word. It works with your existing phone line so there's no set up involved. Call Relay Utah at (801) 530-6716 or toll free 1-866-772-8824 about qualifying for a FREE CapTel™ phone.

Relay Utah is provided by Sprint® and funded by the Utah Public Service Commission.
CapTel is a trademark of Ultratec Inc.

RELAY UTAH
Helping Utah Connect • Dial 711

Sprint 

Understand them, word for word.
Don't just hear what they're saying, read it as well.



Get a lot of rest and
plenty of fluids.
Make sure you call me
if you notice any changes
in your condition.

Ultratec

With this FREE service from Relay Utah, you'll never miss another word. It works with your existing phone line so there's no set up involved. Call Relay Utah at (801) 530-6716 or toll free 1-866-772-8824 about qualifying for a FREE CapTel™ phone.

Relay Utah is provided by Sprint® and funded by the Utah Public Service Commission.
CapTel is a trademark of Ultratec Inc.


RELAY UTAH
Helping Utah Connect • Dial **711**

Sprint 

Sometimes every word is precious.
Don't just hear what they're saying, read it as well.



Mom, guess what? Timmy
said his first word today.
It was mama. Can you
believe it? He just
looked at me and said it.

Ultratec

With this FREE service from Relay Utah, you'll never miss another word. It works with your existing phone line so there's no set up involved. Call Relay Utah at (801) 530-6716 or toll free 1-866-772-8824 about qualifying for a FREE CapTel™ phone.

Relay Utah is provided by Sprint® and funded by the Utah Public Service Commission.
CapTel is a trademark of Ultratec Inc.


RELAY UTAH
Helping Utah Connect • Dial **711**

Sprint 



Don't hang up on business!

Thousands of deaf, hard of hearing, or speech impaired people call businesses everyday. If you receive an incoming call that says, **"Hello, a person is calling you through Relay Utah I am CAs—".** Have you received a relay call before? it is not a telemarketer. Instead, someone with hearing or speech disabilities is trying to contact your company through the use of a Relay Communications Assistant.

For more information call Relay Utah at (801) 530-6716 or toll free at 1-866-772-8824 or visit relayutah.gov



Heber M. Wells Building
160 East 500 South
Salt Lake City, UT 84111

First Class
U.S. Postage
PAID
No. 4621
SLC, UT

Don't hang up on business!

Thousands of deaf, hard of hearing, or speech impaired people call businesses everyday. If you receive an incoming call that says, **"Hello, a person is calling you through Relay Utah I am CAs—".** Have you received a relay call before? it is not a telemarketer. Instead, someone with hearing or speech disabilities is trying to contact your company through the use of a Relay Communications Assistant.

For more information call Relay Utah at (801) 530-6716 or toll free at 1-866-772-8824 or visit relayutah.gov



Heber M. Wells Building
160 East 500 South
Salt Lake City, UT 84111

First Class
U.S. Postage
PAID
No. 4621
SLC, UT




Are you one of the 20,000 Utahns who cannot hear on the phone?

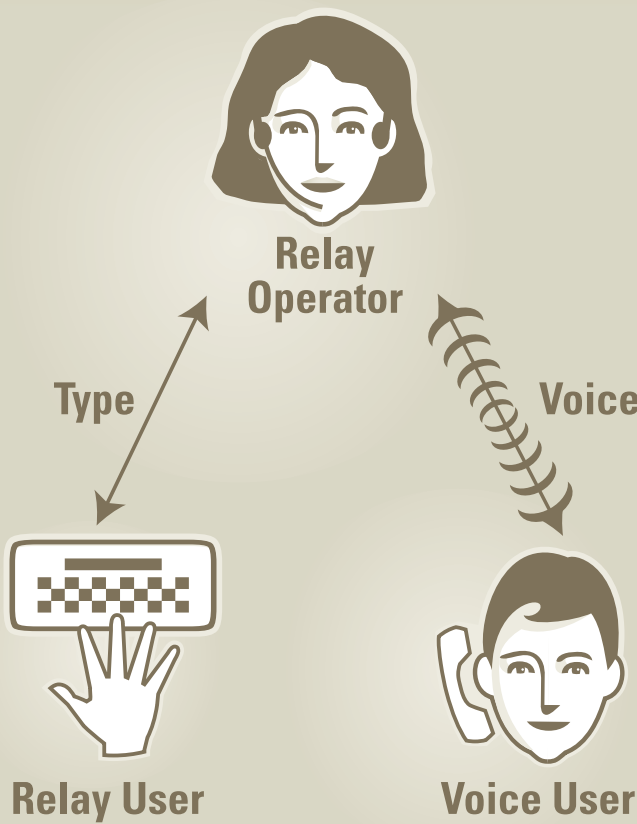
Learn how the Public Service Commission helps
Utah's hard of hearing and deaf communicate.

Equipment distribution • Education on services and programs
IP Relay services • Pagers for the deaf

For more information call Relay Utah
at 801-530-6716 or toll free at
1-866-772-8824 or visit www.relayutah.gov







Relay User

Relay Operator

Voice User

Type

Voice

www.relayutah.gov

When every word is important



Making it possible for Utah's deaf, hard of hearing, deafblind and speech disabled to connect.

Dial **7 1 1**

or use these toll-free numbers:

TTY
1-800-346-4128

Voice
1-888-735-5906

VCO/2LVCO
1-800-346-7141

HCO
1-800-346-4128

Spanish Relay
1-888-346-3162

Speech to Speech
1-888-346-5822

ASCII
1-888-735-5907

900 Services
1-900-230-2930

CapTel Relay Service
1-877-243-2823 - Voice to CapTel

Sprint Relay Customer Service
1-800-676-3777

Sprint Video Relay Service
www.utvrs.com

Sprint IP Relay
www.sprintip.com

Relay Utah, Public Service Commission
1-866-772-8824



Other Services

Emergency

In an emergency, dial 9-1-1 directly using a TTY to ensure immediate attention and identification of your location.

Directory Assistance

If a TTY user makes a directory assistance (DA) request, the relay operator will connect to a DA operator. After obtaining the number, the caller may choose to place the call through relay or direct dial TTY to TTY.

International Calls

Relay Utah allows you to place and receive calls to and from anywhere in the world using English or Spanish. Callers from outside the US may access Sprint Relay by calling 1-605-224-1837.

Voicemail Retrieval

To request voicemail retrieval, type the telephone number you wish to call with your password or special instructions and then use "GA."

Answering Machine Retrieval

To request answering machine retrieval, type "AMR GA." The relay operator will type, "PLS PLACE YOUR HANDSET NEXT TO YOUR ANS MACHINE AND TURN ON GA."



Customer Database Profile

A Customer Database Profile stores an individual relay user's call preferences, making those preferences automatically available to relay operators when processing your calls. Sprint Relay Customer Service (1-800-676-3777) can set up your profile when you are on the phone or can send you a form to be returned by mail, as well as answer any questions you may have.



Payphones

There is no charge for TRS calls placed from payphones. Toll calls may be billed through prepaid telephone cards, calling cards, collect, and third party billing.

Outreach

The Public Service Commission and Sprint Relay are available to provide outreach in the form of presentations, educational workshops, training sessions, as well as distribute information to a variety of deaf, hard of hearing, hearing, and speech-disabled groups in Utah. In order to obtain any information or schedule an outreach presentation, please contact the PSC toll free at 1-866-772-8824 (V/TTY).

When every
word is important



Your communication solution with Sprint and Relay Utah

Helping Utah connect

Sprint and Relay Utah, run by the Public Service Commission, have teamed up to provide the equipment and services necessary to enable Utah's deaf, hard of hearing, and speech disabled populations to connect with each other and the rest of the world.

- Free relay service that lets you communicate with standard telephone users through specially trained relay operators
- Make calls worldwide, 24 hours a day, 365 days a year
- No restrictions on the number, length, or type of call
- All calls are confidential and no records of any conversations are maintained

Is there a charge?

There is no charge for using Relay Utah within your local calling area. Long distance call rates are determined by your long distance carrier of choice. Sprint long distance calls are billed at a reduced rate. Notify the relay operator of your preferred billing option including:

- Direct
- Collect
- Third party
- Local exchange carrier calling card
- Other long distance calling card
- Prepaid calling card

What equipment do I need?

The most common device used to make a relay call is a TTY (text telephone), and the Captioned Telephone has more recently become available. However, the equipment you need may vary depending upon your disability.

For more information about equipment meeting your needs, please contact: The Public Service Commission toll-free at **1-866-772-8824**.

In many cases, equipment may be available at no cost to you.

Equipment and Services for the Deaf and Speech Disabled

Traditional Relay with TTY

7-1-1 or direct dial 1-800-346-4128 (TTY)

A deaf person uses a TTY to type his/her conversation. A Communication Assistant (CA) reads the typed conversation to a hearing person.



The CA relays the hearing person's spoken words by typing them back to the TTY user.

Hearing users can call TTY users through Relay Utah. The CA types the hearing person's spoken words to the TTY user and reads back the typed replies.

- Dial 7-1-1 or dial direct at 1-888-735-5906
- You will hear, "Relay Utah CA ### (Communication Assistant – Number). May I have the number you wish to call please?"
- Give the CA the area code and telephone number
- The CA will process the call

Be sure to talk directly to the person you are calling and not the Communication Assistant. Avoid the use of "tell him" or "tell her." Use "GA" or "Go Ahead" at the end of each response.

Spanish Relay

1-888-346-3162

TTY users can type in Spanish and their conversations will be relayed in Spanish to the called party. Spanish to English or English to Spanish translation is also available through Relay Utah.

Hearing Carry Over (HCO)

1-800-346-4128

Speech-disabled users with hearing listen to the person they are calling. The HCO user types his conversation for the relay operator to read to the standard phone user.

Speech-to-Speech

1-888-346-5822

A person with a speech disability can use his own voice, or voice synthesizer, over the phone. Specially trained relay operators serve as the speech-disabled person's voice and repeat his responses, when necessary, to the other party, ensuring that people with speech disabilities will be heard and understood.

Internet Protocol Relay (IP Relay)

www.sprintip.com (Sprint Internet Protocol Relay)

Users need a computer, a phone line, Internet access, and a Web browser.

- Easy call set up
- Language preferences
- Background color and text options
- Resizable "one" window with split screen
- Simplified printing function
- Increased reliability
- Experienced and accurate operators
- Available 24 hours per day
- No high-speed Internet access required
- No domestic long distance charges
- No TTY needed
- Browser options: Internet Explorer, Netscape, Firefox, and Safari
- Live customer service



Video Relay Service (VRS)

www.utvrs.com (Utah Video Relay Service powered by Sprint)

www.sprintvrs.tv (for any video phone)

- Available 24 hours per day
- Use American sign language (ASL), ASL with VCO, or ASL/Spanish
- Experienced VI's
- Receive videomail messages
- Online help with live customer service
- No long distance charges in the US



Equipment and Services for the Hard of Hearing

Voice Carry Over (VCO)

1-800-346-7141

Hard-of-hearing callers can speak directly to hearing people. A CA types the hearing person's replies to the VCO user's TTY or VCO phone for him/her to read.



Two-line Voice Carry Over (VCO)

1-800-346-7141

A person with two phone lines and/or a computer uses one line to speak to a hearing person and the other line to receive the hearing person's typed responses. The result is natural conversation flow without pauses.

Amplified Phone

- Allows user to control the volume and tone
- Eliminates background noises
- Large key pad buttons
- Includes hearing aid compatible handset

CapTel™ Phone (Captioned Telephone)

- Hear almost simultaneously your caller's voice and see captions of everything said to you
- Bright, easy-to-read display
- Functions as a traditional telephone so everyone can use it



Two-Line CapTel Service

With two telephone lines, this service allows you to speak and hear directly over one telephone line while receiving the captions over the other line. Two-line CapTel eliminates the need for separate telephone numbers for callers to remember – they just dial your phone number directly.

NOTE: CapTel users are responsible for their own long distance charges. There is no extra charge for using CapTel Relay Service.



Appendix U: Copy of TRS Information in Telephone Directory

Directory to Phone Service

Telephone subscribers requiring changes to their current directory white pages listings or those subscribers requesting the set-up of new listings to appear in the White Pages should contact their local telephone service provider directly to arrange for such listing services.



X5 Solutions

Service for Your Business

Hours: 8:00 a.m. - 5:00 p.m., Monday - Friday
To order new service, additional service, to change or disconnect service or questions regarding service888 588-1501

Repair Service888 588-1501

Administrative Offices:
X5 Solutions
1520 4th Avenue, Ste. 500
Seattle, WA 98101



XO Communications

8851 South Sandy Parkway
Sandy, UT 84070

Telecom & Internet Service for Your Business

Local sales, service, billing and customer care801 983-1700

Customer Care888 575-6398

Services for Customers with Disabilities

Instead of dialing an 800#, you now only need to dial 7-1-1. Dialing 7-1-1 is a free connection to the state transfer relay service for TTY and voice calls to and from the speech and hearing impaired.

Qwest Center for Customers with Disabilities

Hours: 7:00 a.m. - 4:30 p.m., Monday - Friday, PST
Qwest provides telecommunication services for customers with motion, vision, speech and hearing disabilities.
TTY/Voice1 800 223-3131
Fax503 242-6565

For TTY (Telecommunications Device for the Deaf)

Customers, Trained Representatives can:

- Establish LONG DISTANCE DISCOUNTS for Qwest's TTY customers. (Eligibility requirements must be met to qualify for discounts.)
- Order or disconnect telephone service, and answer billing questions.
- Handle Qwest repair requests.

For Customers with Vision and Motion Disabilities

- Qwest's Directory Assistance service is an automated service.
- If a physical limitation prevents you from using this automated service, press "0" (zero) at the beginning of the call to reach an agent.
- If a physical limitation prevents you from using our automated services, directory assistance and operator services, we offer exemption from directory assistance and operator dialing assistance charges.
- Our representatives can explain eligibility requirements.

Qwest Print Material

- Qwest also offers selected "LARGE PRINT" material (excludes directories) and Braille billing upon request.
- Contact our representatives for more information.

AT&T's Operator Service for TTY

24-Hours1 800 855-1155

7-1-1 Dialing

Now it is easier than ever to communicate with friends, family and business associates who are deaf, hard of hearing or speech disabled and use a TTY device.

Just dial 7-1-1 on your regular phone.*

You will be connected to a Communications Assistant, who will relay the conversation in the strictest confidentiality, to the phone number you specify. The Communications Assistant uses a TTY and has been trained to help conversations flow accurately and with ease.

7-1-1 is available 24-hours a day, 7 days a week. Try it. It's as simple as 7-1-1.

*no additional charges for 7-1-1

Utah Relay Service

TTY1 800 346-4128
Voice1 888 735-5906
ASCII1 888 735-5907

Utah Relay Service is a communications service that links, Deaf, Hard of Hearing, Speech Impaired and Hearing People via the telephone. To use this service, dial the appropriate number listed above. Give the agent the number you would like to call, and he or she will stay on-line to relay the conversation. You can talk directly with the person you are calling. All calls and information are confidential. This 24 hour relay service is provided at no cost to callers. Long distance calls will be billed accordingly.

Appendix V: Copy of Telephone Bill with Surcharge Rate



Customer Service 1 800 244-1111

MARY GRAIN
Account Number: 801 282-5784 034R
Visit www.qwest.com

* Qwest Local Service Detail (continued)		
Service Additions & Changes	Item Rate	Subtotal
Dec 15, 2006 Order Number R72238093		
HSI Single Port Modem Purch	59.99	
S&H Single Port Modem	9.99	
		\$69.98
Taxes, Fees & Surcharges		
<i>The following charges are permitted by local, state and federal governments. For more information, visit our website at www.qwest.com.</i>		
Federal Excise at 3%	.22	
State Sales at 4.75%	3.19	
City Sales at 1.35%	.91	
Special District Sales at .5%	.34	
Recovery of Municipal Telecommunications Tax	.25	
State 911 at \$.13 per access line	.13	
<i>This surcharge, funds the cost of providing emergency services communications systems in your community.</i>		
Local 911 at \$.65 per access line	.65	
<i>This surcharge, funds the cost of providing emergency services communications systems in your community.</i>		
Federal Universal Serv Fund at 9.1%	.58	
<i>This charge recovers the amount Qwest contributes to the Federal Universal Service Fund. This fund helps keep local phone rates affordable for all Americans.</i>		
Telecommunication Relay Service Fund at \$.10 per access line	.10	
<i>This charge funds relay centers that help hearing- and speech-impaired customers make and receive calls.</i>		
Utah Poison Control Center Surcharge	.07	
<i>This surcharge was established by the Utah state legislature to pay for the cost of the University of Utah Poison Control Center.</i>		
Federal Access Charge	6.34	
<i>This charge, allowed by the FCC, covers part of the cost for providing access to and maintenance of the local network.</i>		
		\$12.78
Total Qwest Local Service		\$82.76